

EXHIBIT 3

Video Deposition of Corey Daugherty

June 21, 2023

Hendrix v. CRC Insurance Services, Inc., et al.

2:21-CV-0300-MHH



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1 IN THE UNITED STATES DISTRICT COURT 2 NORTHERN DISTRICT OF ALABAMA 3 SOUTHERN DIVISION 4 5 CASE NUMBER: 2:21-CV-0300-MHH 6 7 KATHRYN HENDRIX, 8 Plaintiff, 9 vs. 10 CRC INSURANCE SERVICES, INC., TRUIST FINANCIAL 11 CORP, and TRUIST BANK, 12 Defendants. 13 14 15 VIDEO DEPOSITION TESTIMONY OF: 16 COREY DAUGHERTY 17 18 19 JUNE 21, 2023 20 9:32 A.M. 21 22 23	Page 1	1 of the trial, or at the time said deposition is 2 offered in evidence, or prior thereto. 3 IT IS FURTHER STIPULATED AND AGREED 4 that notice of filing of the deposition by the 5 Commissioner is waived. 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Page 3
1 STIPULATION 2 IT IS STIPULATED AND AGREED by and 3 between the parties through their respective 4 counsel that the deposition of COREY DAUGHERTY 5 may be taken before Tanya D. Cornelius, RPR, 6 CSR, and Notary Public, at the offices of 7 Barrett & Farahany, 2 20th Street North, Suite 8 900, Birmingham, Alabama, on the 21st day of 9 June, 2023, commencing at approximately 9:32 10 a.m. 11 IT IS FURTHER STIPULATED AND AGREED 12 that the signature to and the reading of the 13 deposition by the witness is NOT waived, the 14 deposition to have the same force and effect as 15 if full compliance had been had with all laws 16 and rules of Court relating to the taking of 17 depositions. 18 IT IS FURTHER STIPULATED AND AGREED 19 that it shall not be necessary for any 20 objections to be made by counsel to any 21 questions, except as to form or leading 22 questions, and that counsel for the parties may 23 make objections and assign grounds at the time	Page 2	1 INDEX 2 EXAMINATION BY: PAGE NUMBER 3 MS. GILL 9 4 5 6 ***** 7 8 EXHIBIT INDEX 9 PLAINTIFF'S EXHIBIT NO: PAGE NUMBER 10 1 Notice of Deposition 10 11 2 Dashboard 62 12 3 Answers to Interrogatories 71 13 4 E-mail 79 14 5 E-mail 80 15 6 Form 97 16 7 Learning History 106 17 8 Application 129 18 9 Notes 140 19 10 Employment Agreement 146 20 11 Marketing Document 147 21 12 Document 149 22 13 Photo 169 23 14 Document 173	Page 4

1	EXHIBITS (Continuing)	Page 5	1 I, Tanya D. Cornelius, RPR, CSR, and 2 Notary Public, acting as Commissioner, certify 3 that on this date, as provided by the Federal 4 Rules of Civil Procedure, and the foregoing 5 stipulation of counsel, there came before me at 6 the offices of Barrett & Farahany, 2 20th Street 7 North, Suite 900, Birmingham, Alabama 35203, 8 beginning at 9:32 a.m., COREY DAUGHERTY, witness 9 in the above cause, for oral examination, 10 whereupon the following proceedings were had:	Page 7
11			11	
12			12	
13			13 VIDEOGRAPHER: We are going on the 14 record. The date is June 21st, 2023. The time 15 on the monitor is 9:32 a.m. Central Standard. My 16 name is Taylor Holland, and our court reporter is 17 Ms. Tanya Cornelius. We're here on behalf of 18 Cite Court Reporting out of Montgomery, Alabama.	
19			19 This is the video deposition of Mr. 20 Corey Daugherty, who is the corporate 21 representative of CRC Insurance Services, 22 Incorporated, which was noticed by Leslie Palmer 23 for the case Hendrix V CRC Insurance Services,	
1	A P P E A R A N C E S	Page 6	1 Incorporated, et al. It's filed in the U.S. 2 District Court for the Northern District of 3 Alabama, Southern Division, Case Number 4 2:21-CV-0300-MHH. 5 Counsel, please identify yourselves 6 for the record, and we'll start with the 7 plaintiffs. 8 MS. PALMER: Leslie Palmer for 9 plaintiff Kathryn Hendrix. 10 MS. GILL: Patricia Gill for 11 plaintiff Kathryn Hendrix. 12 MS. BARLOTTA: Rachel Barlotta for 13 CRC Insurance, Truist Financial, and Truist Bank. 14 MS. WUNDERLICH: Kayla Wunderlich for 15 CRC, Truist Bank, and Truist Financial. 16 VIDEOGRAPHER: Thank you. Will our 17 reporter please administer the oath to the 18 witness? 19 COREY DAUGHERTY, 20 being first duly sworn, was examined 21 and testified as follows: 22	Page 8
2				
3	FOR THE PLAINTIFF:			
4	PALMER LAW, LLC			
5	BY: Leslie A. Palmer, Esq.			
6	104 23rd Street South, Suite 100			
7	Birmingham, Alabama 35233			
8				
9	PATRICIA A. GILL, P.C.			
10	BY: Patricia A. Gill, Esq.			
11	P.O. Box 55204			
12	Birmingham, Alabama 35255			
13				
14	FOR THE DEFENDANTS:			
15	BAKER, DONELSON, BEARMAN, CALDWELL			
16	& BERKOWITZ, P.C.			
17	BY: Rachel Barlotta, Esq.			
18	Kayla M. Wunderlich, Esq.			
19	420 North 20th Street, Suite 1400			
20	Birmingham, Alabama 35203			
21				
22	ALSO PRESENT: Kathryn Hendrix			
23	Taylor Holland, Videographer			

1 THE REPORTER: Will this be usual 2 stipulations? 3 MS. BARLOTTA: We're going to read 4 and sign. 5 MS. GILL: Everybody ready? 6 THE WITNESS: Yep. 7 8 EXAMINATION 9 BY MS. GILL: 10 Q. All right. If you could please state 11 your name for the record. 12 A. Corey Edward Daugherty. 13 Q. Mr. Daugherty, my name is Patricia 14 Gill, and I represent CRC in a lawsuit that 15 Kathryn Hendrix has filed against them. Have you 16 ever given a deposition before? 17 A. I have. 18 Q. Okay. As you know, because you've 19 done this before, if you can say yes or no out 20 loud for the court reporter so that she can 21 record it. This one is a little different, 22 because we are videoing it, but if you could do 23 that for her, that way we can read the transcript	Page 9	1 A. I have not. 2 Q. Okay. Do you understand that you're 3 here in the capacity of a 30(b)(6) corporate 4 representative for CRC? 5 A. Yes. 6 Q. And you understand that your answers 7 are binding on the company? 8 A. Yes. 9 Q. I'm just going to kind of go through 10 this notice if you want to flip through it. I 11 have some questions to ask about each of these 12 topics that are listed in the notice. 13 A. Okay. 14 Q. Well, first, what is your position at 15 CRC? 16 A. Professional liability broker, senior 17 vice-president. 18 Q. And what does CRC do? 19 A. We are a commercial insurance 20 wholesale brokerage firm. 21 Q. How long have you been at CRC? 22 A. I started April 1st, 1996. 23 Q. Okay. And my understanding is you're	Page 11
1 later; is that fair? 2 A. Yes. No. 3 Q. And if you don't understand any of my 4 questions, I would just ask that you let me know 5 you don't understand, and I'll gladly rephrase 6 it; is that fair? 7 A. Yes. 8 Q. And if you don't ask me to rephrase 9 it, I'm going to assume that you understand my 10 question; is that fair? 11 A. Yes. 12 Q. Are you on any drugs or medication 13 that would alter your ability to answer my 14 questions today? 15 A. No. 16 Q. Okay. Mr. Daugherty, I'm going to 17 show you what I've marked as Plaintiff's Exhibit 18 Number 1. 19 (Whereupon, Plaintiff's Exhibit No. 1 20 was marked for identification and a copy of same 21 is attached hereto.) 22 Q. It's a copy of the deposition notice. 23 Have you seen a copy of that?	Page 10	1 a broker now? 2 A. Correct. 3 Q. Okay. How long have you been a 4 broker? 5 A. I started July of 2000 after 6 graduating UAB as a broker in training and was on 7 a team that was led by Betsy Barnett at the time. 8 I was on her team in the training capacity for 9 approximately, I would say, five, six years, then 10 in 2008 rolled off of her team and started my own 11 team. 12 Q. And a lot of the questions today I 13 think are going to be of the structure of the 14 company. So I guess is broker the highest level 15 of position that you can get outside of 16 executives? 17 A. Correct, yes. 18 Q. I guess let's just start from the top 19 and go down, like the top would be the president 20 or CEO? 21 A. Yes. 22 Q. Who is that? 23 A. David Obenauer.	Page 12

1 Q. Okay. And is he president or CEO or 2 both? 3 A. Both. I believe he wears both titles 4 now. 5 Q. And who is below David? 6 A. Our office -- well, Brent Tredway is 7 who our office reports into. 8 Q. And what is his position? 9 A. I don't know Brent's exact title, but 10 he's out of our Houston office. 11 Q. You don't know if he's a 12 vice-president or anything like that? 13 A. He's -- president of wholesale 14 operations would be -- 15 Q. And you said your office reports to 16 him? 17 A. Uh-huh (positive response). 18 MS. BARLOTTA: Is that a yes? 19 A. Yes. 20 Q. Who is below -- the next in line 21 below him? 22 A. John Cadden. 23 Q. And what is his position?	Page 13	<p>1 Q. Okay. Below John Cadden, who is 2 that? 3 A. Each department has an individual 4 within their department that manages the 5 respective departments in the CRC Birmingham 6 office, which would be property, casualty, and 7 professional liability. 8 Q. Property, casualty, and then 9 professional liability? 10 A. Professional liability. 11 Q. Are those the only two departments in 12 Birmingham? 13 A. Three. Property and casualty are 14 their own separate. 15 Q. Okay. And so each of those 16 departments has a manager? 17 A. Yes. 18 Q. Who is the manager for the 19 professional liability? 20 A. Rusty Hughes. 21 Q. And who is the manager for property? 22 A. Paul Martin. 23 Q. And the manager for casualty?</p>	Page 15
1 A. He's office president, CRC 2 Birmingham. 3 Q. Okay. And would it be fair to say -- 4 how many offices do y'all have? 5 A. I don't know. 6 Q. I mean, are there offices more than 7 just the Birmingham and Houston office? 8 A. Oh, yes. 9 Q. And so would it be fair to say the 10 other offices in other cities would have a 11 structure similar to the Birmingham office? 12 A. Yes. 13 Q. Okay. And that they would report to 14 David -- I missed his last name. 15 A. Obenauer. 16 Q. Obenauer as well? 17 A. Yes. 18 Q. Or Brett Tredway, I guess, would be 19 -- it's David, then Brett, and then each 20 individual city's office? 21 A. Office. 22 Q. Is that correct? 23 A. Yes.	Page 14	<p>1 A. Peter Curtin. 2 Q. Are you familiar with the plaintiff 3 in this case, Kathryn Hendrix? 4 A. Yes. 5 Q. And I think she sometimes goes by 6 Kat? 7 A. Yes. 8 Q. Did she ever work in the property or 9 casualty departments? 10 A. Not that I'm aware of. 11 Q. And did Kat Hendrix work in the 12 professional liability department? 13 A. Yes. 14 Q. Who is below the manager, Rusty 15 Hughes? 16 A. Each individual broker team lead. 17 Q. I think you mentioned you trained 18 with Betsy Barnett. Did she have her own team? 19 A. She's retired. 20 Q. At the time that Kathryn Hendrix was 21 there, did she have a team? 22 A. No. She had already retired. 23 Q. I guess, name each team.</p>	Page 16

1 A. My team, of course. Rusty Hughes has 2 a team. He and Tyler O'Connor run that team. 3 James Powell and Alex Gould, G-o-u-l-d. Trey 4 Reich, T-r-e-y R-e-i-c-h, Lee McClure, 5 M-c-c-l-u-r-e. 6 Q. Okay. 7 A. And then Scott Trigg is head of our 8 underwriting programs. 9 Q. So Scott Trigg has his own team, but 10 they're not brokers -- 11 A. Correct. 12 Q. -- they're underwriting? 13 A. Yes. 14 Q. So if I count correctly, you have 15 seven broker teams and then the one underwriting 16 team? 17 A. Yes. 18 Q. Are each of the teams comprised of 19 the same number of brokers and subordinates or 20 are they different? 21 A. Each is different. 22 Q. Is the leader of each team the only 23 actual broker on the team?	Page 17	1 broker teams? 2 A. Yeah. 3 Q. And then one underwriting team. You 4 don't think that Truitt had an inside broker? 5 A. Not at that time of hire. 6 Q. Did all the teams have associate 7 brokers? 8 A. Let me think. 2014. I don't know at 9 that time what Corey Woodward's title would have 10 been or how long Corey Woodward had been with us, 11 but he's on Trey Reich's team. But all the other 12 teams would have had an associate broker or 13 another broker on the team at that time. 14 Q. And I guess let's talk about that. 15 What are the different types of brokers that you 16 can have? 17 A. Inside broker. 18 Q. Okay. 19 A. There's a title associate broker, 20 which we view that as another broker on a team, 21 and then, of course, the lead broker. 22 Q. So associate broker is the same thing 23 as a broker?	Page 19
1 A. No. 2 Q. So some teams might have two brokers? 3 A. Yes. 4 Q. And does each team have inside 5 brokers? 6 A. No. 7 Q. Which teams do not have inside 8 brokers? 9 MS. BARLOTTA: Are you talking about 10 currently? 11 MS. GILL: I'm talking about when Kat 12 Hendrix was there. 13 A. Oh, when Kat Hendrix was there. Let 14 me think back. Rusty Hughes did not have an 15 inside broker at that time. I do not recall. 16 James Powell did not have an inside broker at 17 that time. Truitt Taylor, I do not believe, had 18 an inside broker when she was hired. And Truitt 19 Taylor is another team lead. Sorry. 20 Q. Okay. I was looking through my list. 21 I didn't see that name. 22 A. Yeah. 23 Q. So that is actually eight different	Page 18	1 A. Yeah. They're just another broker on 2 the team that's responsible for their production. 3 Q. So there's really no difference in 4 job duties between associate broker and broker? 5 MS. BARLOTTA: Object to form. 6 A. Some in terms of leadership and 7 management of the team and responsibility. 8 Q. Excluding leadership and management 9 of the team, are the day-to-day duties of the 10 broker the same as an associate broker? 11 A. Yes. 12 Q. And the associate broker is revenue 13 producing? 14 A. Yes. 15 Q. Okay. Tell me what is the difference 16 between those two positions and an inside broker. 17 A. An inside broker works on the team in 18 the capacity of supporting a team from a growth 19 perspective, primarily the responsibility of 20 helping to market existing business and place new 21 business from existing retail relationships. 22 Significantly less travel commitment. 23 Q. I guess the emphasis is on the word	Page 20

1 "inside" as it relates to that? 2 A. Correct, yes. 3 Q. It's work that you already -- that 4 already exists and owns. They just maintain it 5 and keep it going, I guess? 6 A. Yes. And inside also referring to 7 the fact that there's less of a travel 8 expectation or commitment or responsibility. 9 Q. Is an inside broker revenue 10 producing? 11 A. Not directly in terms of new 12 business. An inside broker is responsible for 13 maintaining and generating revenue-existing 14 business. 15 Q. Now, I've also seen some information 16 produced, I can't remember where, about an 17 account executive. What is that position? 18 A. An account executive is a 19 service-based role. Account executives support 20 the team in the capacity of marketing some 21 business at the direction of the broker, sending 22 out submissions with cover letters that have 23 typically been prepared by the broker, issuing	Page 21	1 A. Yes. They do them every day. 2 Q. And I believe you just said that the 3 account executive also markets at the direction 4 of the broker? 5 A. Yes. 6 Q. What do you mean by market? 7 A. When we get -- so us being a 8 wholesaler, so when we get a submission from one 9 of our retail clients, that submission comes to 10 us. 11 Typically, the way that it works is 12 the broker looks at it, reviews the submission 13 documents, application, loss runs, the industry 14 that we're dealing with, the product line that 15 we're dealing with. 16 We will then put together what we 17 refer to as a cover letter, which will have 18 account name, it will have the account website, 19 it will have exposure, which could vary. If 20 we're dealing with, you know, a general business, 21 revenue is going to be the exposure. If we're 22 dealing with an employment practices liability 23 placement, employee counts is going to be the	Page 23
1 quotes, issuing binders, sending out requests to 2 bind, invoices, issuing endorsements, reviewing 3 policies in some capacity for accuracy, and then 4 just general service needs of our retail clients. 5 When somebody needs a change to a 6 policy or has a question about an invoice or 7 accounting function, typically the account 8 executive role is the person that handles that. 9 Q. So would you characterize the account 10 executive as being more administrative or 11 secretarial? 12 MS. BARLOTTA: Object to form. 13 A. Administrative, not secretarial. 14 Administrative, but, I mean, they do things that 15 are extremely important in providing the customer 16 experience and making sure that our client 17 service needs are met efficiently and 18 effectively. 19 Q. Are any of those duties that you just 20 listed, like issuing quotes for binders, 21 invoices, any of those things that you listed, 22 are brokers, associate brokers, or inside brokers 23 required to do those tasks?	Page 22	1 exposure basis. 2 We will reference on that cover 3 letter the current coverage, who they're with 4 right now on the insurance company side, their 5 loss history, attachments, identify what we're 6 looking for. 7 We will typically send that out to a 8 market, and then I or the broker will follow that 9 up to someone on the team and say, We also need 10 to send this to X, Y, Z markets. It could be as 11 few as two or three markets or it could be as 12 many as twenty-five or thirty different markets. 13 Q. So would you characterize that as 14 they're reaching out to potential new clients to 15 drum up business? 16 A. No. 17 Q. Okay. 18 A. They're not reaching out to the 19 client in that capacity. They're reaching out to 20 the insurance company. The client is who sends 21 us the business. We then send that out to the 22 insurance company. 23 So in that phase of the transaction,	Page 24

1 we got the account from our client. It could be 2 a renewal. It could be a piece of new business 3 from an existing client or it could be a piece of 4 new business from a brand new client we've never 5 worked with before. 6 Q. Who is your client? What is their 7 position? 8 A. Retail insurance agency. 9 Q. Okay. So like if you go to your 10 local State Farm Insurance office, they could 11 potentially be your client? 12 A. They would not. State Farm is a 13 personal lines carrier. We're commercial 14 insurance. 15 Q. Commercial insurance? 16 A. Yes. 17 Q. Okay. And I was just using State 18 Farm as an example. They're the first company 19 that came to my mind, but okay. 20 A. Right. It happens often. 21 Q. Okay. But something like that, like 22 an agency? 23 A. Yes.	Page 25	1 Q. At the time that Kathryn Hendrix was 2 there. 3 A. At the time she was there was myself, 4 Clay, Kathryn, Yvette, Andrea, and then Tiffany 5 joined in January of 2018. 6 Q. All right. Let's go through each one 7 of those. Clay, what is Clay's last name? 8 A. Segrest. 9 Q. And what was his position? 10 A. Broker. 11 Q. He was a broker? 12 A. Yes. 13 Q. Was he a broker at the time that 14 Kathryn Hendrix was there? 15 A. Yes. 16 Q. Okay. And then you mentioned Yvette? 17 A. Uh-huh (positive response). 18 Q. What was Yvette's last name? 19 A. Talsma, T-a-l-s-m-a. 20 Q. And what was her position? 21 A. Account executive. 22 Q. And then what was -- you mentioned 23 Tiffany?	Page 27
1 Q. I mean an insurance company that has 2 different agencies with agents in their offices, 3 those agents would be your clients? 4 A. Yes. 5 Q. Okay. I just want to make sure I 6 understand correctly. 7 Okay. What about a broker assistant? 8 A. Broker assistant, we've got one on 9 our team now. A broker assistant is someone who 10 does not have any responsibility for quoting, 11 binding, marketing, reviewing coverage. 12 The role that I have on my team now, 13 the broker assistant handles all renewal 14 solicitations for our clients and -- 15 Q. That's what they do now? 16 A. And tax documents. 17 Q. Did they do that before -- when 18 Kathryn Hendrix was there? 19 A. We didn't have a broker assistant on 20 the team at that time. 21 Q. Are there any other members of the 22 team that I have missed? 23 A. Currently or at the time?	Page 26	1 A. Yes, Sanders. 2 Q. And what was her position? 3 A. Account executive. 4 Q. Andrea? 5 A. Andrea Sutton, S-u-t-t-o-n. 6 Q. Okay. 7 A. Account executive. 8 Q. Okay. And then, of course, Kathryn 9 Hendrix? 10 A. Yes. 11 Q. What was her position? 12 A. She was hired as an account 13 executive. 14 Q. Did she receive any promotions from 15 account executive? 16 A. She did. 17 Q. What promotion did she receive? 18 A. Inside broker. 19 Q. And do you remember when she received 20 that promotion? 21 A. It was end of summer or early fall of 22 2017, I believe. 23 Q. And why did Kathryn Hendrix get the	Page 28

1 promotion? 2 A. It was something that she had shown 3 interest in. We had talked about it, about her 4 wanting to get out of the account executive role. 5 We felt like she was capable, so we promoted her. 6 Q. Okay. When was Clay Segrest hired as 7 broker? 8 A. He was hired in 2008 as a broker in 9 training. 10 Q. 2008? 11 A. Uh-huh (positive response) -- excuse 12 me. 2009. 2009. 13 Q. Okay. And when did he become an 14 actual broker? 15 A. I don't know the answer to that 16 question to be exact. He was hired as a broker 17 in training, which at that time was kind of a 18 mentoring program that CRC had. 19 It was how I was hired. I was hired 20 as a broker in training with Betsy Barnett. I 21 was in that capacity with her for five to six 22 years. 23 Q. So he also trained with Betsy	Page 29	Page 31
1 Barnett? 2 A. Yeah. He was on Betsy's team with me 3 as well. 4 Q. Did you offer the broker in training 5 position to Kathryn Hendrix? 6 MS. BARLOTTA: Object to the form. 7 A. No. 8 Q. Not you personally but CRC? 9 A. No. 10 MS. BARLOTTA: Object to form. 11 Q. Why not? 12 A. That was not the position that we 13 were needing at that time. Our position 14 requisition was for an account executive. We 15 made the offer. She accepted it. 16 Q. And when Kathryn expressed an 17 interest in becoming -- getting out of the 18 account executive role and becoming a broker, did 19 y'all offer her broker in training at that point? 20 MS. BARLOTTA: Object to form. 21 A. We did not. 22 Q. And so at that point is when you put 23 her in the inside broker position?	Page 30	Page 32

1 worksheets. Those are already calculated by 2 corporate. They are sent to the broker team. 3 And on that worksheet it will have revenue that 4 that team has produced, then it will have the 5 various numbers that go into the formula. 6 It will have a two percent amount 7 that's provided by CRC for bonuses, and then 8 there will be a total aggregated amount that's 9 available to the broker. 10 Q. Okay. So if I'm understanding you 11 correctly, the bonus -- each broker team gets a 12 specific bonus based on that formula? 13 A. Based on that formula -- 14 MS. BARLOTTA: Object to form. 15 A. -- and based on that team's specific 16 revenue that they have produced over that period 17 of time. 18 Q. Okay. So based on what you produce, 19 but that's plugged into the formula? 20 A. Yes. 21 Q. And that determines what your team 22 makes? 23 A. What you as the individual broker	Page 33	<p>1 Q. So it is entirely in that broker's 2 discretion who gets what on his team? 3 MS. BARLOTTA: Object to form. 4 A. Yes. 5 Q. Do you -- once you make that decision 6 of the bonuses of the individuals on your team, 7 do you report that to the higher-ups like Rusty 8 or Mr. Cadden? 9 A. Yes. 10 Q. And do they have any veto power? 11 A. Not -- I've never seen it if they do. 12 Q. You've never seen it or they don't? 13 A. I've never seen it. 14 Q. Okay. Is it possible they do, but 15 they haven't utilized it? 16 MS. BARLOTTA: Object to form. 17 A. I don't know. 18 Q. Specifically as it relates to your 19 team, how did you determine who got what bonuses? 20 A. There's several things that go into 21 it. Tenure with the company, tenure with the 22 team. 23 Q. Okay.</p>	Page 35
1 makes. 2 Q. Okay. How are the bonuses 3 distributed between the individuals on your team? 4 A. It's the broker's discretion. 5 Q. Okay. Are there any checks and 6 balances to the decisions made by the broker? 7 MS. BARLOTTA: Object to form. 8 A. I think that varies by team. It's 9 not something that is company wide. It's 10 something that each individual team probably 11 looks at differently depending on their 12 structure. 13 Q. And I think you may have answered my 14 question. What you're saying is each broker 15 divvies it up differently within their team and 16 adds up to that team? 17 A. Yes. 18 Q. Is there anything that checks how 19 that broker is divvying it up? 20 MS. BARLOTTA: Object to form. 21 Q. Any rules or procedures? 22 MS. BARLOTTA: Object to form. 23 A. Not that I'm aware of.	Page 34	<p>1 A. Relationships that are being handled, 2 accounts that are being handled, the volume of 3 premium, experience, knowledge, and whether that 4 individual is responsible for any level of 5 individual production. 6 What I mean by that is production 7 outside of any relationships that I may bring to 8 the table over the years. Someone that is 9 traveling and going out and developing brand-new 10 relationships, bringing business into the firm 11 that I don't touch, that I don't see, that I have 12 no dealings with. 13 Q. So would it be fair to say that that 14 factor cannot apply -- like an inside broker will 15 never meet that factor, because they're working 16 on inside business? 17 A. Yeah. 18 Q. Is there ever a situation where an 19 inside broker can go outside and create new 20 relationships? 21 A. If they wanted -- yeah, if they 22 wanted to move into a broker role. 23 Q. Were inside brokers ever prevented</p>	Page 36

1 from traveling and creating new business? 2 A. No, not that I'm aware of. 3 Q. Were there ever situations where 4 inside brokers were being given so much account 5 executive duties that they were unable to travel? 6 MS. BARLOTTA: Object to form. 7 A. No, not that I'm aware of. I would 8 add to that that in that capacity of an inside 9 broker, as an associate broker, as a broker in 10 general, when I'm traveling and I'm on the road, 11 there are tasks that I do, that any broker in our 12 firm does, that I would absolutely say are 13 administrative. 14 I'm constantly requesting loss funds 15 that are requested from our clients. I'm 16 constantly sending requests for changes to a 17 policy to an insurance company because their 18 retailer calls me or sends me an e-mail and asks 19 me to do that. 20 Q. I guess what my question is: If an 21 inside broker is assigned so many executive 22 assistant duties that there's no additional time 23 to travel and create new business, has that ever	Page 37	Page 39
1 happened? 2 MS. BARLOTTA: Object to form. 3 A. Not that I'm aware of. 4 Q. So my understanding is since Ms. 5 Hendrix has been gone, there has been a change in 6 the structure of the teams, and there's no longer 7 an associate broker or inside broker. Is that 8 the case? 9 MS. BARLOTTA: Object to form. 10 A. Are you talking about my team in 11 particular or are you talking about teams in 12 general? 13 Q. I was talking about teams in general, 14 but we'll start with your team first. 15 A. I don't have an inside broker 16 currently. 17 Q. Do you have an associate broker? 18 A. No. 19 Q. And why did you make those changes? 20 MS. BARLOTTA: Object to form. 21 A. It was just a decision that we 22 decided to make in our day-to-day operations, and 23 we felt it was the best decision at the time for	Page 38	Page 40

1 A. Not currently, no. 2 Q. When you say not currently, did they 3 in the past? 4 A. No. 5 Q. Okay. And what about Lauren Green? 6 Does she create new business? 7 A. She does not. 8 Q. Okay. I'm going to shift some gears 9 and talk about some other stuff. I kind of got 10 off on a structure tangent. Let's go through 11 this list here. 12 A. Okay. 13 Q. What is the e-mail program used by 14 the defendant from 2017 to 2020? 15 A. Outlook. 16 Q. Do you know what level of plan y'all 17 utilize? 18 A. I do not. 19 Q. I know that they have three different 20 -- for example, they have an E1, an E3, or E5. 21 Are you familiar with any of those plans? 22 A. I am not. 23 Q. Do you use any other programs for	Page 41	1 like that? 2 A. No. 3 Q. So you primarily used e-mail? 4 A. Yes. 5 Q. Did you have like e-mail groups? 6 A. Yes. There's several within the 7 firm. 8 Q. Like I know, for example, like my 9 firm has an e-mail list that goes out to all 10 attorneys or it goes out to just the associates 11 or just the support staff. Do y'all have things 12 like that? 13 A. We had, and we still do have 14 Birmingham Professional e-mail group or list, I 15 guess you would refer to it as. And then Bham 16 Professional Brokers, I think, is how it's 17 referred to. 18 Q. Who all is included on the Bham 19 Professional Brokers list? 20 A. I would not be able to tell you. 21 Q. I mean, what positions? Is it 22 broker, associate brokers, and inside brokers? 23 A. It should be, but that's not	Page 43
1 listservs? 2 A. What do you mean by listserv? 3 Q. Like when you -- I guess I'm thinking 4 of like Teams or what is it? I can't think of 5 any all of the sudden off the top of my head. 6 Like -- okay. Like do you have any organizations 7 created within the e-mails to chat and talk to 8 each other? 9 A. There's no chat function that I'm 10 aware of in Outlook. 11 Q. Okay. 12 A. That we utilize. 13 Q. Do y'all utilize Teams? 14 A. We do now. 15 Q. Okay. 16 A. As of recently during the pandemic. 17 Q. So would that have been after my 18 client left? 19 A. Yes. 20 Q. What did y'all use to communicate 21 with each other prior to that? 22 A. E-mail. 23 Q. You don't have any Slack or anything	Page 42	1 something that we in the department amend, 2 change, have anything to do with. Those are 3 default groups that are set up in our Outlook 4 network. 5 Q. Who creates them? 6 A. I do not know. 7 Q. You don't amend them or change them 8 or -- each individual, like you as a broker, you 9 don't go and change or amend those groups? 10 A. I do not. 11 Q. What if somebody is left off a group 12 that should be on it? How do you correct that? 13 A. I do not know the answer to that. 14 Q. Has that ever happened? 15 A. Not that I'm aware of. 16 Q. On the Birmingham Professional 17 e-mail, who all is included on that? 18 A. I would not be able to confirm that 19 with any specificity. It should be all staff 20 within our professional liability department. 21 Q. I guess that's why it's called 22 professional, that's the professional liability 23 department?	Page 44

<p>1 A. Yes.</p> <p>2 Q. So that should include brokers' 3 assistants, account executives, inside brokers, 4 associate brokers, and brokers?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. Are there any other lists or 7 groups that you're aware of?</p> <p>8 A. Not that I'm aware of.</p> <p>9 Q. How does an employee when they get 10 hired get added to that list?</p> <p>11 A. I do not know the answer to that 12 question.</p> <p>13 Q. Are you familiar with Workday?</p> <p>14 A. I am.</p> <p>15 Q. And what is Workday?</p> <p>16 A. It's a program that was introduced to 17 us through BB&T and Truist, and it's where 18 functions -- it's where staff log time. It's 19 where each teams' structure, teammates, benefit 20 information, compensation information is all 21 held.</p> <p>22 Q. So would you characterize it as like 23 a human resources program?</p>	<p>Page 45</p> <p>1 where teammates can go and pull pay stubs, look 2 at pay stubs. Like I said, log time.</p> <p>3 Q. Okay.</p> <p>4 A. Any notification that we get as far 5 as reviews, all is stored within Workday.</p> <p>6 Q. So I guess does the Workday program 7 generate like charts to show you productivity and 8 what people are producing and things like that?</p> <p>9 A. No.</p> <p>10 Q. Okay. I think you said log time. So 11 that's why I was wondering. I don't know. And 12 so it doesn't store revenues of those people?</p> <p>13 A. No.</p> <p>14 Q. What would -- would an associate 15 broker or inside broker be required to input 16 information in there?</p> <p>17 A. Any information about their 18 employment, yes, but I can't think of anything 19 else.</p> <p>20 Q. So you can go in -- or if I worked 21 for you, I could go in and modify my profile or 22 whatever on Workday?</p> <p>23 A. I don't know that there's even a --</p>
<p>1 A. I don't know that I would 2 characterize it as a human resources program. I 3 think it's probably a tool that our human 4 resources department uses.</p> <p>5 Q. Okay. And it's just to store 6 different information about each employee and 7 about each of their accounts or clients?</p> <p>8 A. Not clients. There's no client 9 information in Workday.</p> <p>10 Q. Okay. And did you have Workday 11 between 2017 and 2019?</p> <p>12 A. We did.</p> <p>13 Q. And did each individual person in 14 each practice group, is what I'm -- your team --</p> <p>15 A. Uh-huh (positive response).</p> <p>16 Q. -- did they input information into 17 Workday?</p> <p>18 A. They did.</p> <p>19 Q. And what kind of information would 20 you put in Workday as a broker?</p> <p>21 A. It would be really just team 22 specific. It would be individuals on your team. 23 It would be base salary, compensation. It's</p>	<p>Page 46</p> <p>1 there's not really a profile in there to amend.</p> <p>2 When we hire somebody, they're automatically put 3 into Workday. When we hire someone, we have to 4 go in and complete a task in Workday.</p> <p>5 When we terminate someone, we have to 6 go in and complete a termination form in Workday.</p> <p>7 But it's really just --</p> <p>8 Q. Any kind of change in employment 9 information?</p> <p>10 A. Yes.</p> <p>11 Q. A promotion, a raise?</p> <p>12 A. Yes.</p> <p>13 Q. A bonus is -- is that all included in 14 there?</p> <p>15 A. Yes.</p> <p>16 Q. Is things like time off and leave 17 information contained on Workday as well?</p> <p>18 A. Yes.</p> <p>19 Q. And can you upload -- like say if 20 somebody goes on FMLA and they have a doctor's 21 excuse, would you upload that on Workday, or 22 where is that stored?</p> <p>23 A. That, I wouldn't know.</p>

1 Q. You as the lead -- as the broker of 2 your team, would you have access to everybody 3 else's information on Workday? 4 A. Yes. 5 Q. And would the lower subordinates have 6 access to other people's information on Workday? 7 A. No. 8 Q. If you wanted to pull up your own pay 9 stubs, do you have like a dashboard or something 10 to pull up and click on and it will list your pay 11 stubs? 12 A. Within Workday, yes. 13 Q. Okay. And that's true of every 14 employee there? 15 A. Yes. 16 Q. Is there a way as a manager that you 17 could go in and say, This is everybody on my 18 team, and these are their pay stubs? 19 MS. BARLOTTA: Object to form. 20 A. I don't know that I could see their 21 pay stubs, but I know with certainty that I could 22 go and see their compensation. 23 Q. Okay.	Page 49	Page 51
1 A. Their base salary comp. 2 Q. Would it just generate a report? 3 A. You just click their name, and it 4 shows -- or you click my team, and it shows every 5 individual person, and you can click their name, 6 and it shows their salary comp. 7 Q. Other than storing employee 8 information or change of employment information, 9 do you use Workday for any other purposes? 10 A. No. 11 Q. Is there any kind of messaging or 12 chat information on Workday? 13 A. No. 14 Q. To get onto Workday, do you login 15 from your desktop? 16 A. Yes. 17 Q. Where does that data that you input 18 into Workday come from? 19 MS. BARLOTTA: Object to form. 20 A. What do you mean by data, what data? 21 Q. For instance, you're trying to input 22 salary information of somebody, does that come 23 from just your knowledge of it or --	Page 50	Page 52

<p>1 A. Yes.</p> <p>2 Q. So things are generated, like say you</p> <p>3 want to get a quote and you input all the</p> <p>4 information on that account, it will generate a</p> <p>5 quote for you?</p> <p>6 A. No.</p> <p>7 Q. So it's not that advanced?</p> <p>8 A. No. So when we were talking earlier</p> <p>9 about when a submission comes in, we put the</p> <p>10 cover letter together, we send that out to five</p> <p>11 to twenty-five, thirty insurance companies. When</p> <p>12 that quote comes back to us, to the firm --</p> <p>13 Q. Okay.</p> <p>14 A. -- someone on a team will look at</p> <p>15 that quote, if this is a quote, they would look</p> <p>16 at this quote, and they would type the</p> <p>17 information from that quote basically into a</p> <p>18 quote document that CRC used at the time.</p> <p>19 Q. So would it have -- for example, say</p> <p>20 you write new business. Would it have like the</p> <p>21 date that business was generated? Like new</p> <p>22 client information? It's mostly client</p> <p>23 information?</p>	<p>Page 53</p> <p>1 I need to increase sales here or whatever?</p> <p>2 A. Yeah.</p> <p>3 Q. Whatever you're checking on?</p> <p>4 A. Yeah.</p> <p>5 Q. Okay. Does any information from AIM</p> <p>6 go onto the dashboard?</p> <p>7 A. I don't know the answer to that.</p> <p>8 Q. Okay. Do all positions have a</p> <p>9 dashboard?</p> <p>10 A. All teams have a dashboard.</p> <p>11 Q. Okay. So I guess my question is:</p> <p>12 Would an account executive have a dashboard?</p> <p>13 A. No.</p> <p>14 Q. Would an inside broker have a</p> <p>15 dashboard?</p> <p>16 A. They have a subset of the dashboard</p> <p>17 that shows --</p> <p>18 Q. I think that's where you get their</p> <p>19 wage statements and things like that?</p> <p>20 A. No, that would just be -- wage</p> <p>21 statements would come from Workday.</p> <p>22 Q. Oh. Sorry. I'm getting confused.</p> <p>23 A. Dashboard is the revenue.</p>
<p>1 A. It's client information, yes. But</p> <p>2 client information from the standpoint of it is</p> <p>3 the insured policyholder's information. Our</p> <p>4 client, again, is the retail insurance broker.</p> <p>5 So it will have our client's</p> <p>6 information in there and show that we received</p> <p>7 that account from X, Y, Z insurance agency, but</p> <p>8 the information that's contained in there is</p> <p>9 specific to an insured policyholder that we've</p> <p>10 placed their coverage for.</p> <p>11 Q. So the AIM would have all the private</p> <p>12 information about the clients, and then the</p> <p>13 intranet is more like this is the employee, and</p> <p>14 this is the revenue that they've brought in, and</p> <p>15 this is --</p> <p>16 A. Yes.</p> <p>17 MS. BARLOTTA: Object to form.</p> <p>18 A. AIM has nothing to do with revenue.</p> <p>19 It doesn't show any dashboards or anything like</p> <p>20 that as far as individual teams.</p> <p>21 Q. So if I'm working on your team and I</p> <p>22 want to track my progress, I would go to the</p> <p>23 intranet and look at the dashboard and say, Okay,</p>	<p>Page 54</p> <p>1 Q. Okay. And the same with associate</p> <p>2 broker, they would be able to have a subset?</p> <p>3 A. Uh-huh (positive response).</p> <p>4 Q. Within? I guess are you saying like</p> <p>5 a tab or something that they would click on?</p> <p>6 A. It would just show their name.</p> <p>7 Q. Okay. But -- so can anybody on the</p> <p>8 team look at the team intranet dashboard?</p> <p>9 A. No.</p> <p>10 Q. So if you're an inside broker or an</p> <p>11 associate broker and you want to look at the</p> <p>12 dashboard to track your own progress, you</p> <p>13 couldn't go onto the team dashboard. How would</p> <p>14 you get to your own?</p> <p>15 A. You can.</p> <p>16 Q. Oh, okay. But you can't see the</p> <p>17 other people's?</p> <p>18 A. But you can't see other teams. It</p> <p>19 would just be your specific team.</p> <p>20 Q. Okay. And there's not a subset for</p> <p>21 account executives or broker assistants?</p> <p>22 A. No.</p> <p>23 Q. So did Kathryn Hendrix have her own</p>

1 subset on your team on the dashboard? 2 A. She should have. We had intranet at 3 the time. Dashboard was there. 4 Q. Do you know whether CRC has produced 5 her dashboard at this time? 6 A. I do not. 7 Q. Can you -- to look up an employee's 8 dashboard, is it as simple as clicking on their 9 subset within the team dashboard? 10 MS. BARLOTTA: Object to form. 11 A. Yes. 12 Q. But -- 13 A. Actually, when I go to the dashboard 14 site, it automatically pulls up our team's 15 information. 16 Q. Because you're the broker? 17 A. Uh-huh (positive response). 18 Q. So -- but you don't have access to 19 other team's information? 20 A. Not detailed information. So our 21 dashboard is set up, and we're a sales 22 organization, so we're set up as -- if I open up 23 the dashboard on any given day, it pulls up our	Page 57 1 I'm going to see the total aggregated revenue for 2 that team for all two hundred plus teams, and 3 we'll be able to see where you as an individual 4 team rank amongst the firm. 5 Q. So you could have pulled up the other 6 eight teams and see what their revenue was? 7 A. Yeah. 8 Q. In the Birmingham Professional 9 liability? 10 A. But I can't see -- but you're not 11 able to see -- I'm not going to be able to go to 12 James Powell's dashboard and see where his 13 business is coming from, where -- how many 14 submissions they have, how much, you know, fee 15 income they've generated. It would just show an 16 aggregated total revenue number. 17 Q. I would assume somebody above you 18 would have access to all the teams. 19 MS. BARLOTTA: Object to form. 20 Q. Who would that be? 21 MS. BARLOTTA: Object to form. 22 A. Yeah, I mean, we're a sales 23 organization, and we've got leadership that looks	Page 59 Page 60 1 at revenue and looks at growth and production 2 trends. And so within the Birmingham office, 3 Rusty is able to look at, John Cadden would be 4 able to look at, and it would go up the tower. 5 Q. And you said 2018 is no longer there? 6 A. Well, we -- 7 MS. BARLOTTA: Object to form. 8 A. We used to be -- we had an intranet 9 site that was called Connect, and then they 10 updated our systems a few years ago, and now it's 11 called Dashboard. I don't -- I don't know how 12 the data was archived or what came over or what 13 didn't come over. 14 Q. Anything before 2019, if you needed 15 to access it, how would you do that? 16 A. I do not know the answer to that. 17 Q. But anything from 2019 forward would 18 be as simple as pulling up your team -- 19 A. Dashboard. 20 Q. -- and just printing it off? 21 A. Yeah. 22 Q. Do you have a document retention 23 policy?
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1 MS. BARLOTTA: Object to form. 2 A. Yeah, we do. 3 Q. How long are you required to retain 4 documents? 5 MS. BARLOTTA: Object to form. 6 A. I don't know the answer to that. 7 MS. GILL: We've been going about an 8 hour. Do you want to take a break? 9 MS. BARLOTTA: Sure. 10 THE WITNESS: Sure. 11 VIDEOGRAPHER: All right. We'll go 12 off the record at 10:33 a.m. 13 (Whereupon, a brief recess was 14 taken.) 15 VIDEOGRAPHER: We are back on the 16 record at 10:47 a.m. 17 Q. (BY MS. GILL:) Before we went on 18 break we were talking about the dashboard, and I 19 believe you said it mentioned your team and, you 20 know, their stats, like the revenue and things 21 like that. 22 A. Uh-huh (positive response). 23 Q. So your board had Kathryn Hendrix on	Page 61	Page 63
1 it? 2 A. It should have. 3 Q. Okay. Do you remember whether or not 4 she was on it? 5 A. I do not. 6 Q. Okay. And I can't remember, would it 7 also have the account executives as well on 8 there? 9 A. No. 10 Q. Okay. Do you know whether you've 11 produced your dashboard in this case? 12 MS. BARLOTTA: Object to form. 13 A. I do not. 14 Q. I'm just going to show you what I'm 15 marking as Plaintiff's Exhibit Number 2 . 16 (Whereupon, Plaintiff's Exhibit No. 2 17 was marked for identification and a copy of same 18 is attached hereto.) 19 Q. Have you seen these documents before? 20 A. Not this particular document. 21 Q. Okay. Is this an example of what 22 you're talking about with dashboard? 23 A. It is.	Page 62	Page 64

1 A. No, they would not. 2 Q. Okay. 3 A. Not on this particular screenshot of 4 this document. 5 Q. Is there a tab where you can find 6 those? 7 A. The way that this document works is 8 if we were at a computer, you could click -- I 9 would be able to click on my name. I couldn't 10 click on anyone else's name on this list, but I 11 would be able to click on my name, and then it 12 would pull up on the screen what I mentioned to 13 you earlier, submission count, policy count, new 14 business revenue, total revenue, numbers compared 15 to budget. 16 Q. Can you flip to the next page and see 17 is this what you're referring to? 18 A. Yeah. 19 Q. Okay. Does it list each of the 20 individuals in the group? 21 A. It doesn't list them all. It lists 22 Clay, Kathryn, and Yvette. 23 Q. Is Yvette a broker?	Page 65	1 AIM, which you asked me about earlier -- 2 Q. Okay. 3 A. -- and with a name, you've got -- 4 whatever team member on any specific team is 5 entering in that submission, they would put the 6 team name, which in this case it would be Team 7 Daugherty or Team Lewis, whatever broker you're 8 referring to. 9 There's a marketing rep spot that 10 shows the marketing rep, and then there's an 11 account exec spot. It happens all the time where 12 if somebody is clearing a piece of business and 13 they mistakenly put Yvette Talsma, for instance, 14 somehow Yvette Talsma's name probably got dropped 15 into that marketing rep tab, and that is the way 16 the program is set up to where whatever account 17 is shown -- whatever account shows someone as a 18 marketing rep, their name would show up on this 19 document, so -- 20 Q. So would you say that Kathryn 21 Hendrix's stats on this document are input by 22 Kathryn? 23 MS. BARLOTTA: Object to form.	Page 67
1 A. She is not. 2 Q. Okay. Okay. In this, it lists Clay 3 Segrest as an inside broker? 4 A. That's how it refers to all the -- 5 that's just how the system is set up. It refers 6 to all. 7 Q. And if you look on the -- just below 8 the tabs it's got a date on there. Do you see 9 that date? 10 A. Uh-huh (positive response). 11 Q. What is the date on there? 12 A. September 24th, 2018, it appears. 13 Q. Okay. So that would have been, 14 obviously, when Kathryn was there? 15 A. Yes. 16 Q. Because she's listed on there. Do 17 you know why Andrea Sutton and Tiffany Sanders 18 are not listed on there? 19 A. No. I mean, our system -- you know, 20 the way that our system is set up, this data that 21 comes into this dashboard is based on input from 22 team members and employees within the firm. 23 So when you clear a submission in	Page 66	1 A. I don't know the answer to that. 2 Q. Okay. Would you sometimes put the 3 stats in for your subordinates? 4 A. Sure, sure. I mean, most of the 5 time, you know, when a new piece of business 6 comes in, it's an account executive that clears 7 that piece of business. 8 But like I mentioned earlier, if I'm 9 sitting at my desk or Clay is sitting at his desk 10 or any broker is sitting at their desk and a 11 submission comes in, it's just as easy for me to 12 enter that submission in. 13 Q. Okay. So, generally, though, most of 14 the time it would be an account executive that 15 enters? 16 A. Yeah. 17 Q. And that basically was my question. 18 It's coming from everybody on your team, not -- 19 there's not one specific person designated to 20 input the information? 21 A. Correct. 22 Q. Okay. Can you, for example, just 23 pull up a date range and print up the dashboard	Page 68

1 for your team during that date range? 2 A. Yeah. 3 Q. Are you familiar with Trello? 4 A. Yeah. 5 Q. What is Trello? 6 A. Trello has nothing to do with CRC. 7 It's not a corporate app. It's an app that I 8 think I might have discovered it, but someone 9 within our group discovered it in the app store. 10 And it's basically an app that allows 11 you to create boards. And our team started using 12 it for marketing purposes and just intellectual 13 capital purposes on our team. 14 So, for instance, you can create a 15 new board, and you could title that board, you 16 know, senior living, which in our industry refers 17 to nursing homes, assisted living. We place a 18 lot of that business. 19 And on that particular board for 20 senior living, you could list all the insurance 21 companies that we do business with that will 22 insure nursing homes. 23 We could create a separate board for	Page 69	Page 71
1 architects and engineers, lawyers professional, 2 physician medical/malpractice. Any product that 3 we place as a wholesale insurance broker you 4 could create these board and put contact 5 information for those respective insurance 6 companies. 7 And the idea behind that was that 8 instead of us having to constantly talk about and 9 communicate which insurance companies are doing 10 what, it was a way for everyone to have data and 11 information in one spot. 12 Q. Just kind of like an easy chart, if 13 you will, saying this company does this? 14 A. Yeah. 15 Q. Okay. 16 A. So if somebody on the team got a 17 submission, you know, that was a nursing home, 18 they could pull up Trello on their phone, look at 19 the nursing home board and say, Okay, The Doctors 20 Company, MedPro, Ironshore, Berkley are all 21 markets that will look at this business, and 22 here's the contact information for the 23 underwriter at that company.	Page 70	Page 72

<p>1 Q. Are you aware of that?</p> <p>2 A. Well, the term "communicate" was not</p> <p>3 like realtime communication. At some point that</p> <p>4 app was opened up like a public forum, almost</p> <p>5 like an open source type app to where other</p> <p>6 people within the department if they wanted to</p> <p>7 could download the app to their phone and then</p> <p>8 could have access to those same boards that other</p> <p>9 teams were using. It was kind of a sharing of</p> <p>10 information --</p> <p>11 Q. So it wasn't like --</p> <p>12 A. -- resource.</p> <p>13 Q. -- private messaging to each other?</p> <p>14 A. No, no, no. Never.</p> <p>15 Q. Say a new client came up that also</p> <p>16 writes this kind of business, the nursing home</p> <p>17 business, you might add them on there?</p> <p>18 A. Yeah, if you had your own separate</p> <p>19 team within the department and you got a nursing</p> <p>20 home account in and you said, All right, I've got</p> <p>21 access to Trello, I can get onto Trello and see</p> <p>22 that Corey's team has created this board for</p> <p>23 nursing homes. You could look at that board and</p>	Page 73	Page 75
<p>1 say, All right, these are the markets that are</p> <p>2 writing nursing homes. Thanks, Corey.</p> <p>3 Q. So it's stored on everybody's app on</p> <p>4 their phones or desktops or wherever?</p> <p>5 MS. BARLOTTA: Object to form.</p> <p>6 A. It would be on anybody's phone or</p> <p>7 iPad that chose to download the app and submit a</p> <p>8 form for access to it.</p> <p>9 Q. So your understanding is there's no</p> <p>10 private text messaging function?</p> <p>11 A. No.</p> <p>12 Q. Okay. I just wanted to clarify that.</p> <p>13 A. Yeah.</p> <p>14 Q. How do you generally chat in the</p> <p>15 office? You said earlier you used e-mails. Did</p> <p>16 y'all use any other systems?</p> <p>17 A. No.</p> <p>18 Q. Did y'all use Trello to store tasks?</p> <p>19 A. No.</p> <p>20 Q. Do you know if the Trello -- do you</p> <p>21 have Trello for Slack or Trello for Google Chat?</p> <p>22 A. I don't even know that the two are</p> <p>23 related to one another.</p>	Page 74	Page 76

1 A. No. At that time we did not. We 2 just recently within the past couple of months 3 had a signature block template sent to us by 4 corporate. And the catalyst behind that was the 5 State of California passed legislation or 6 something to the insurance industry that requires 7 that any broker that does business in California 8 has to have their California license number on 9 their signature block. 10 But prior to that, I was not aware of 11 any mandated signature block template. 12 Q. Did -- could anybody create their own 13 signature? 14 A. Yeah, as far as I know. 15 Q. And did anybody review employees' 16 signature blocks? 17 MS. BARLOTTA: Object to form. 18 A. Not that I'm aware of. 19 Q. Did you instruct your team to include 20 certain information in their signature block? 21 A. I did not. I believe up until 22 recently most people just had their name, CRC 23 Insurance Services or CRC Group, and their	Page 77	1 you an example. 2 A. Yeah. 3 Q. Okay. What about like when you're 4 out of the office, automatic replies, who creates 5 those? 6 A. The person who's out of the office. 7 Q. Okay. And -- let me show you this. 8 MS. GILL: What am I, 4? 9 THE REPORTER: Yes. 10 A. Uh-huh (positive response). 11 (Whereupon, Plaintiff's Exhibit No. 4 12 was marked for identification and a copy of same 13 is attached hereto.) 14 Q. (BY MS. GILL:) For example, on your 15 e-mail, you've got your team members listed at 16 the bottom. Do you see that? 17 A. Yes. 18 Q. Is there a reason Kathryn Hendrix is 19 in there with Andrea and Tiffany? 20 A. Yeah. She's a member of the team. 21 Q. Was she a broker at that point in 22 time? 23 A. What is this date? Yeah, she was an	Page 79
1 e-mail, and their phone number. 2 Q. I guess, for example, I've seen on 3 your e-mails, you would have your team listed, 4 each person on your team listed. 5 A. Uh-huh (positive response). 6 Q. Is that consistent throughout your 7 team? Everybody is supposed to have that on 8 there or is that -- 9 A. I think most do. I've not checked to 10 see, but I think most do at this point. 11 Q. At this point they do. Did they when 12 Kathryn Hendrix was there? 13 A. I do not know. 14 Q. Is there ever a situation where a 15 member would be omitted from a team? 16 MS. BARLOTTA: Object to form. 17 A. Not that I recall. 18 Q. Was there ever a situation where 19 somebody misrepresented their position on their 20 signature block? 21 MS. BARLOTTA: Object to form. 22 A. Not that I recall. 23 Q. On your e-mails -- well, I'll show	Page 78	1 inside broker. 2 Q. Is Yvette Talsma an account 3 executive? 4 A. She is. 5 Q. Okay. On Page 2 of this exhibit, it 6 looks like there's a different e-mail from you. 7 A. Uh-huh (positive response). 8 Q. And the order is changed up of your 9 team members. Do you remember changing that? 10 A. I do not. 11 Q. Do you know why you would change it? 12 A. I do not. 13 Q. Let me show you what I'm marking as 14 Plaintiff's Exhibit Number 5 . 15 (Whereupon, Plaintiff's Exhibit No. 5 16 was marked for identification and a copy of same 17 is attached hereto.) 18 Q. Let me show you Plaintiff's Exhibit 19 5. I'm sorry. Let me give you the one with the 20 sticker. 21 A. Yeah. 22 Q. Do you see Clay's automatic reply? 23 A. I do.	Page 80

1 Q. Do you know why Kathryn Hendrix is 2 omitted from being on his team? 3 A. I do not. 4 MS. BARLOTTA: Object to form. 5 A. I don't know if Kathryn was out of 6 the office that day or if she had something else 7 going on that day or if Clay felt like anything 8 that might have come up when he was out of the 9 office that day could have been handled by the 10 account executives. 11 Q. Okay. So Clay would have done this? 12 A. Clay would have done this, yes. 13 Q. Did you see that e-mail when it came 14 through? 15 A. I can't say specifically. It wasn't 16 addressed to me. It was addressed to Kathryn. 17 If I sent Clay an e-mail, I would have seen it. 18 Q. Do you know who Jonathan Morgan is? 19 A. I do. 20 Q. And what was his position? 21 A. He's on Truitt Taylor's team. 22 Q. Was he a broker, inside broker, 23 associate broker?	Page 81	1 Q. I'm sorry. Yeah, account executives. 2 A. No. 3 Q. Or broker assistants? 4 A. No. 5 Q. Or associate brokers? 6 A. No. 7 Q. Did anybody from other teams give 8 your people assignments? 9 A. No, not that I'm aware of. The only 10 time that brokers really -- the only time that 11 broker teams really interact with one another in 12 that capacity is situations where, you know, 13 another team may have an expertise or a 14 relationship that could benefit another broker 15 team, and you will agree to co-broke an account. 16 Q. Okay. 17 A. But that's an anomaly. It doesn't 18 happen very often. 19 Q. Was Brandon Hayes on your team? 20 A. He was not. 21 Q. Did you ever assign him any tasks? 22 A. I did not. 23 Q. Did -- what about the website? Who	Page 83
1 A. I honestly think he was hired as an 2 inside broker, but I don't know for sure. He 3 wasn't on my team. I had no involvement with his 4 employment. 5 Q. Do you know whether his signature 6 line said he was an associate broker when he was 7 an inside broker? 8 A. I do not. 9 Q. But that would have been up to him to 10 prepare the signature line? 11 A. Yeah, him and his team. Again, I had 12 no day-to-day involvement with Jonathan in terms 13 of business and how their team functions. He's 14 on Truitt's team, which is a completely separate 15 group. 16 Q. Did you ever give assignments to 17 people who were not on your team? 18 A. No. 19 Q. What about did you ever give 20 assignments to executive assistants that were not 21 on your team? 22 A. Executive assistants? You mean 23 account executives?	Page 82	1 creates the content for the website? 2 A. I don't know the answer to that. I 3 mean, now our marketing department does it. They 4 should have done it then, but I can't say 5 precisely who would have done it. 6 Q. When you hire somebody new, I think 7 you said you had hired three new people since 8 Kathryn has left -- 9 A. Uh-huh (positive response). 10 Q. -- did you provide the marketing 11 department information on those new hires for 12 them to put on the website? 13 A. I did not. Now we have on the 14 intranet site, there's a spot where individual 15 employees can go and submit a request for their 16 picture to be on the website, for their title, 17 for their bio, for references, for any 18 publication that they may have put out to be 19 available. That's employee specific. They can 20 update and adjust their website presence as they 21 see fit. 22 Q. Are you aware that Jonathan Morgan is 23 listed on the website as an associate broker?	Page 84

<p>1 A. I am not.</p> <p>2 Q. But your understanding is he was</p> <p>3 hired as an inside broker?</p> <p>4 A. Yes.</p> <p>5 Q. I really don't want to attach all</p> <p>6 this. I think I'm just going to show you. It</p> <p>7 looks like it's CRC-Hendrix Bates Number 4979.</p> <p>8 I'll just kind of show you. It's a big thing, so</p> <p>9 I just --</p> <p>10 MS. BARLOTTA: Are you marking this</p> <p>11 as an exhibit?</p> <p>12 MS. GILL: I'm not, because it's so</p> <p>13 big.</p> <p>14 MS. BARLOTTA: Okay. Can I see it?</p> <p>15 THE WITNESS: Absolutely.</p> <p>16 MS. GILL: I mean, I guess I could</p> <p>17 pull that front page off. I guess I could do</p> <p>18 Page 1 and 2.</p> <p>19 MS. BARLOTTA: Okay.</p> <p>20 Q. (BY MS. GILL:) I guess I'm really</p> <p>21 just referring to 4979 and 4980. That identifies</p> <p>22 Mr. Morgan as an inside broker, doesn't it?</p> <p>23 A. It does.</p>	<p>Page 85</p> <p>1 Q. Did you receive any e-mails from</p> <p>2 groups other than Birmingham Professional?</p> <p>3 MS. BARLOTTA: Object to form.</p> <p>4 A. Yeah.</p> <p>5 Q. What other groups did you receive</p> <p>6 e-mails from?</p> <p>7 A. There's a group called CRC All.</p> <p>8 Q. Okay.</p> <p>9 A. Which that includes, should include</p> <p>10 every employee within the organization</p> <p>11 countrywide. It's used rarely, but from time to</p> <p>12 time we do get e-mail correspondence from -- sent</p> <p>13 to us through that CRC All distribution list.</p> <p>14 Q. Are there any other groups?</p> <p>15 MS. BARLOTTA: Object to form.</p> <p>16 A. Yeah. Every -- just like Birmingham</p> <p>17 has Birmingham Professional, Birmingham Brokers,</p> <p>18 there's also similar groups set up for Birmingham</p> <p>19 Casualty, Birmingham Property, and, you know, I</p> <p>20 can't speak to other offices, because I'm not in</p> <p>21 those offices, but every other office should have</p> <p>22 some form of similar distribution e-mail list</p> <p>23 specific to their office.</p>
<p>1 Q. Okay. And that's what you thought he</p> <p>2 was hired as?</p> <p>3 A. Yeah.</p> <p>4 Q. I just wanted to make sure. Okay.</p> <p>5 Yeah, I didn't mark it.</p> <p>6 Okay. I know we kind of touched on</p> <p>7 Outlook and how you had different groups of</p> <p>8 people like the Birmingham Professional and</p> <p>9 different groups. Who was responsible for</p> <p>10 creating those groups?</p> <p>11 MS. BARLOTTA: Object to form.</p> <p>12 A. I don't know the answer to that.</p> <p>13 Q. Could any individual create a group?</p> <p>14 A. Not that I'm aware of. I've never</p> <p>15 done it, wouldn't know how.</p> <p>16 Q. Do you know who created Birmingham</p> <p>17 Professional?</p> <p>18 MS. BARLOTTA: Object to form.</p> <p>19 A. I do not.</p> <p>20 Q. Are there any rules or procedures or</p> <p>21 policies related to creation of groups?</p> <p>22 MS. BARLOTTA: Object to form.</p> <p>23 A. Not that I'm aware of.</p>	<p>Page 86</p> <p>1 Q. When you receive an e-mail from, for</p> <p>2 example, Birmingham Professional, would it say</p> <p>3 Birmingham Professional or does it list the</p> <p>4 people in the group?</p> <p>5 A. Birmingham Professional. I mean, I</p> <p>6 think you can click Birmingham Professional and</p> <p>7 double click, and it will expand to see who's in</p> <p>8 that, but I've never done it. I think once you</p> <p>9 do it, you can't get it back to the way that it</p> <p>10 was or something.</p> <p>11 But yeah, to answer your question, it</p> <p>12 just shows that it came from CRC All or to</p> <p>13 Birmingham Professional.</p> <p>14 Q. Are there any other groups that</p> <p>15 you're aware of?</p> <p>16 A. Not that I'm aware of.</p> <p>17 Q. Is there a separate group Birmingham</p> <p>18 Professional Broker?</p> <p>19 A. Yeah, Bham Professional Brokers,</p> <p>20 yeah.</p> <p>21 Q. Do you have any reason or knowledge</p> <p>22 why Kathryn would be omitted from an e-mail or a</p> <p>23 listserv group?</p>

1 MS. BARLOTTA: Object to form. 2 A. I do not. 3 Q. Do you know whether she was omitted 4 from an e-mail or listserv group? 5 A. I do not. 6 Q. Do you have any information or 7 knowledge that brokers were told to no longer use 8 Birmingham Professional and to switch to another 9 group? 10 A. Not specifically, no. 11 Q. Do you generally have knowledge of 12 that? 13 A. No. I don't remember -- 14 Q. Did you hear rumors of that? 15 A. I don't remember a situation where we 16 would. I mean, some of that depends on the 17 situation as to why one versus the other would be 18 used. If there was something going on that the 19 entire department needed to be involved in or an 20 event or underwriter or a client coming into 21 town. 22 Q. So -- 23 A. One versus the other could be used.	Page 89	1 in that context would be once we knew who was 2 coming, who was attending the dinner. You know, 3 obviously, there's text communication probably 4 that would have gone on to say, Hey, I'm going to 5 be late or I'm going to be there, I'll meet you 6 guys at the restaurant at 5:30 or whatever the 7 case may be. 8 But there was no text group or 9 anything like that used for anything business 10 related like that as far as appointments, 11 dinners, meetings, et cetera that I'm aware of. 12 Q. What about to communicate leads and 13 other business development information? Would 14 y'all use text messages? 15 A. No. 16 Q. Never? 17 A. No. Leads in our business within the 18 organization really just doesn't happen. I mean, 19 we are, you know, seven, eight broker teams, if 20 you're including underwriting. We operate our 21 own teams as our own businesses basically. 22 Q. Okay. 23 A. So we're -- you know, and it's a very	Page 91
1 Q. Okay. But you are not -- are you 2 aware of any additional groups? For example, you 3 said an event or an underwriter. Like could 4 there be a group for that event? 5 A. No, not a separate group, no. 6 Q. Or a group of underwriters coming 7 into town -- 8 A. No. 9 Q. -- we're going to dinner and drinks 10 with that group? 11 A. No, we would still use Birmingham 12 Professional, Birmingham Professional Brokers, 13 just depending on the event and who any 14 particular client or insurance company that's 15 coming to see us wanted to have invited. 16 Q. Would a group text be used for those 17 kind of situations? 18 A. No. 19 Q. Like somebody is coming to dinner, 20 let's invite these people? 21 A. No. 22 Q. That would never be used? 23 A. No. The only time text would be used	Page 90	1 healthy environment, but it's a competitive 2 environment with the other teams in our office. 3 So other teams in the office have their clients 4 that they call on that they go and try and get 5 business from. 6 Like I would never reach out to Rusty 7 Hughes and say, Hey, I've got a retail broker 8 that I've heard about in Colorado that you should 9 go try and get business from. I'm going to try 10 and go get that. So there's no referral program 11 within our department. 12 Q. Is there -- what about you also 13 wouldn't get Rusty's clients? 14 A. Correct. No. 15 Q. What about say the person in Colorado 16 is open and you're going to go try to get that, 17 would you communicate with your team over text 18 message about what you're going to do to develop 19 that business? 20 A. No. The team would know that I'm 21 traveling and where I am and who I'm going to 22 see, but that would be done either in person, I'm 23 going to be out of the office the next three days	Page 92

1 traveling to Denver, Colorado seeing X, Y, Z 2 clients or send an e-mail saying, Hey, I'm going 3 to be out of the office the next three days 4 traveling on business. 5 Q. Have you ever gotten a text from 6 someone's personal phone or company phone about 7 leads? 8 MS. BARLOTTA: Object to form. 9 A. I have not. 10 Q. Do you have company phones? 11 A. Yeah. 12 Q. Okay. And who all is issued a 13 company phone? 14 A. Typically, it's broker roles. I 15 can't say for sure whether there are exceptions 16 to that, but -- 17 Q. Do you know whether Kat had a company 18 phone or personal phone? 19 A. She had a company phone. 20 Q. And she had to turn it back in, 21 didn't she? 22 A. She did. 23 Q. And so the company would have been in	Page 93	1 Q. Do you know whether CRC took steps to 2 preserve the contents of Kat's phone when she 3 turned it in? 4 MS. BARLOTTA: Object to form. 5 A. I do not. 6 Q. Did you receive or see Kat's EEOC 7 charge? 8 A. I did. 9 Q. When did you see it? 10 A. I don't recall exactly, but I do 11 remember seeing it. 12 Q. And do you remember Page 2 of -- the 13 notice to the employer contains a preservation 14 request? 15 A. I don't recall that. 16 Q. Did y'all take any steps to try to 17 preserve her phone contents? 18 MS. BARLOTTA: Object to form. 19 A. I don't know. 20 Q. Did you direct anybody to wipe the 21 phone clean? 22 MS. BARLOTTA: Object to form. 23 A. I do remember when an employee -- I	Page 95
1 possession and control of her phone once she 2 turned it in? 3 MS. BARLOTTA: Object to form. 4 A. Sure. 5 Q. And so there would have been no 6 issues pulling information from her phone, 7 because it was the company phone? 8 MS. BARLOTTA: Object to form. 9 A. I don't -- I wouldn't know the answer 10 to that. I never was in possession of her phone 11 after her departure. 12 Q. Did you give new phones to Clay or 13 other new agents? 14 MS. BARLOTTA: Object to form. 15 A. Clay has a company phone. 16 Q. Was it the phone produced from the 17 company? I mean, like they didn't use their 18 personal phone number or anything, did he? 19 MS. BARLOTTA: Object to form. 20 A. No. It's a company-issued phone. 21 Q. Do you know whether Kat had her own 22 personal number? 23 A. I don't know.	Page 94	1 don't remember when the EEOC charge came in. It 2 did not come to my attention. I never laid eyes 3 on it until much later once we got into the 4 litigation side of it. 5 Q. You never laid eyes on the charge 6 until much later? 7 A. Yes. But there is a termination form 8 that when somebody is either terminated and/or 9 leaves the company that we have to complete for 10 the IT department to get back any equipment that 11 was issued to that employee. 12 Q. Were you aware that Kat had 13 complained of a difference in treatment between 14 the males and females prior to her departure? 15 MS. BARLOTTA: Object to form. 16 A. I was not. 17 Q. Did she not have any conversations 18 with you over lunch where she felt she was being 19 treated differently? 20 A. Yeah, we went to lunch, but I don't 21 recall anything being a hundred percent based on 22 gender. At that time I remember a lot of those 23 conversations being based around her feeling like	Page 96

Page 97	Page 99
1 she was doing more administrative work than she 2 wanted to do in an inside broker role. 3 Q. I'm showing you what I'm marking as 4 Plaintiff's Exhibit Number 6 . 5 (Whereupon, Plaintiff's Exhibit No. 6 6 was marked for identification and a copy of same 7 is attached hereto.) 8 Q. I'm sorry. You get the one with the 9 sticker. Sorry. 10 A. Yeah, sure. 11 Q. On this form -- I'm just going to ask 12 you, did you fill out this form? 13 A. There's no signature on it. I don't 14 honestly remember exactly whether I did it or 15 someone else prefilled it. I remember seeing 16 this form. 17 Q. Okay. It says requesting manager, 18 Corey Daugherty. 19 A. Uh-huh (positive response). 20 Q. So it's either you or somebody on 21 your behalf filled this out? 22 A. Yep. 23 Q. And at the bottom, it says to wipe	1 that would be the case. I personally did not 2 wipe the phone. Like I said, I never had the 3 phone in my possession. 4 Q. And I guess a better question is: It 5 wasn't wiped before that date? 6 A. Not. 7 Q. It was either that date or later? 8 MS. BARLOTTA: Object to form. 9 A. I would say so, yes. 10 Q. Do you know whether calls to HR were 11 recorded? 12 A. I do not. 13 Q. You don't know? 14 A. I don't know. 15 Q. Would that be a better question to 16 ask HR? 17 A. Sure. 18 MS. BARLOTTA: Object to form. 19 Q. And I guess the same -- do you have 20 any information about documenting complaints of 21 discrimination and how that's done? 22 A. I do not. 23 Q. What were your duties as a broker of
Page 98	Page 100
1 the phone. Do you see that? 2 A. I do see that. 3 Q. And to -- it says she's not a coded 4 producer. Do you see that? 5 A. Uh-huh (positive response). 6 Q. What does that mean? 7 A. So on our team, I was the only coded 8 producer. So the team lead on any -- so if you 9 looked at that broker ranking from the dashboard 10 that we looked at earlier, if you saw any 11 individual's name, Jason Lewis, Rusty Hughes, any 12 other broker's name in the firm, that name that's 13 on that list would be the coded producer. 14 So any other broker on an individual 15 team would not have their own production code. 16 Q. So Clay Segrest would not have a 17 production code? 18 A. He would not. 19 Q. So would it be fair to say as of 20 December 12th, 2019, you or somebody on your 21 behalf wiped the phone? 22 MS. BARLOTTA: Object to form. 23 A. Yes. Based on that date, I would say	1 a team to document any complaints of 2 discrimination? 3 MS. BARLOTTA: Object to form. 4 A. If someone filed a formal complaint 5 with me about discrimination, I would take that 6 to HR. 7 Q. How do you file a formal complaint 8 with you? 9 MS. BARLOTTA: Object to form. 10 A. With me? 11 Q. Yeah. 12 A. If an employee of mine made any 13 charge or comment about discrimination in any 14 way, I would immediately go to HR with that. It 15 wouldn't have to be a filed formal complaint. 16 Q. I just asked that because that's what 17 you said. 18 A. Uh-huh (positive response), sure. 19 Q. Someone could come to you verbally 20 and just complain -- 21 A. Sure. 22 Q. -- and then you would go to HR? 23 A. Yeah.

1 Q. Did you ever have to go to HR from 2 2017 to 2020? 3 A. No. 4 Q. For any employee? 5 A. No. 6 Q. Was there anybody else that would be 7 required to take it to HR if a complaint was 8 made? 9 A. Not that I'm aware of. 10 Q. Would Rusty Hughes or Mr. Cadden be 11 required to take it to -- or Helveston? 12 MS. BARLOTTA: Object to form. 13 Q. Would they be required to report to 14 HR if a complaint was made to them? 15 MS. BARLOTTA: Let me just state for 16 the record that you can ask Mr. Daugherty his 17 opinions and what he knows about the subject, but 18 he's not designated on topics related to HR or 19 discrimination. 20 MS. GILL: That's fine. 21 MS. BARLOTTA: I just wanted to 22 clarify. 23 Q. (BY MS. GILL:) Do you know whether	Page 101	1 A. Not that I'm -- 2 MS. BARLOTTA: Object to form. 3 A. Not that I'm aware of. 4 Q. She didn't say that to you? 5 A. Not that I recall. 6 Q. Did Kat ever complain that people 7 were getting -- more males were getting broker 8 roles over females? 9 MS. BARLOTTA: Object to form. 10 A. Not that I recall specifically to me. 11 Q. If she had made either of those two 12 complaints, would you have told HR? 13 MS. BARLOTTA: Object to form. 14 A. I would have had a conversation with Rusty and with John about it. 15 Q. Did you ever have a conversation with 16 either Rusty or John about more males getting 17 broker positions than females? 18 MS. BARLOTTA: Object to form. 19 A. No. 20 Q. When Kat told you she was being given 21 more administrative work than inside broker work, 22 did she say whether that was fair?	Page 103
1 or have an opinion as to that? 2 A. I don't know. If a charge of discrimination or somebody made a comment to me about being discriminated against, I would elevate it to HR, and I would talk to my leadership team, which would have included Rusty Hughes as the department manager and John Cadden as our office president at that time. 3 Q. Did you ever have to talk to Rusty 4 Hughes or John Cadden from 2017 to 2020? 5 A. Not about discrimination, no. 6 Q. Did you talk to them about any other 7 complaints? 8 MS. BARLOTTA: Object to form. 9 A. Over that period of time, there was obviously some conversations between Rusty and I about Cadden's -- I mean, excuse me, Kathryn's sentiment towards being asked or still doing more administrative work than she felt she needed to be doing or should be doing based on her role as an inside broker. 10 Q. Did Kat ever say Clay wasn't required 11 to do more administrative work?	Page 102	1 MS. BARLOTTA: Object to form. 2 A. No, she didn't make that comment that I recall. 3 Q. What was your response to her when 4 she said that she was being given more 5 administrative work than broker work? 6 MS. BARLOTTA: Object to form. 7 A. I don't remember exactly what the response was. I know that we talked about it. 8 We had a team meeting about it not very long after that, and restructured our team agency assignments to free her up, to try and free her up to do more marketing of business, negotiation and placement of business, and to focus on new business more from existing retail clients that we partnered with. 9 Q. Are there any written policies on the 10 duties of yourself or others to document reports 11 of discrimination? 12 MS. BARLOTTA: Object to form. 13 A. Yeah, I mean, there's going to be something in our employee handbook, and we have training that gets pushed down to us from Truist,	Page 104

1 but I can't speak specifically to it at this 2 time. 3 Q. And when you say training from 4 Truist, is that in-person training or is it on 5 the computer? 6 A. Computer. 7 Q. And is it -- how much training do you 8 do on EEO policies? 9 A. I don't know the timetable, the 10 timeline when they roll it out, but there is 11 discrimination training that we do, that all 12 employees are required to do. 13 Q. I mean, is it once a year? Is it -- 14 A. I mean, at least once a year I would 15 say. No more than twice a year. 16 Q. How much of the training is devoted 17 to EEO? 18 A. I don't know the answer to that. 19 Q. Do you know whether any training was 20 provided after Kat complained of discrimination? 21 A. I do not. 22 MS. BARLOTTA: Object to form. 23 Q. This is Plaintiff's Exhibit Number 7.	Page 105	Page 107
1 (Whereupon, Plaintiff's Exhibit No. 7 2 was marked for identification and a copy of same 3 is attached hereto.) 4 Q. Are you familiar with this document? 5 A. I'm not. 6 Q. You can look at it for a second. 7 (Whereupon, a discussion off the 8 record was held.) 9 Q. Would you look at Page 2 of this 10 document? 11 A. Uh-huh (positive response). 12 Q. It has the titles of the different 13 classes that were taken? 14 A. Yeah. 15 Q. And it appears this was your learning 16 history. Does that seem correct? 17 A. Yeah, it appears to be. 18 Q. Midway through that document, one of 19 the classes is Valuing Diversity and Promoting 20 Inclusion. Do you see that? 21 A. Yeah, I do. 22 Q. And it looks like that was one hour? 23 A. Yes.	Page 106	Page 108

1 A. I do not. 2 Q. Does the employee handbook apply to 3 all employees across the team? 4 A. Yeah, as far as I know, yeah. 5 Q. And so, for example, in your team, 6 you supervise everybody on your team? 7 A. Correct. 8 Q. They're subject to all the rules of 9 the employee handbook? 10 MS. BARLOTTA: Object to form. 11 A. Correct. 12 Q. Do -- are employees of other teams 13 bound by those policies? 14 MS. BARLOTTA: Object to form. 15 A. Yes. 16 Q. And you report to Rusty Hughes, Mr. 17 Cadden, and Mr. Helveston, correct? 18 MS. BARLOTTA: Object to form. 19 A. Not currently, no. 20 Q. At the time that Kathryn was there? 21 A. At the time, yes. 22 Q. And did the other teams also report 23 to Rusty Hughes, Mr. Cadden, and Mr. Helveston?	Page 109	Page 111
1 MS. BARLOTTA: Object to form. 2 A. The other teams within the 3 professional liability department reported to 4 Rusty Hughes. 5 Q. Okay. Did Kat ever tell you Clay 6 treated her like a secretary? 7 A. I don't recall those exact words. I 8 mean, there was -- she expressed that. I mean, I 9 remember her expressing something similar to 10 that, but I don't remember those exact words. 11 Q. And I understand this was a while 12 ago, but that was the gist of one of her 13 complaints? 14 A. Yeah. She was complaining about 15 administrative work. 16 Q. And did she complain that she was 17 treated different from men? 18 MS. BARLOTTA: Object to form. 19 A. Not that I recall, not to me 20 directly. 21 Q. Did she complain about the company as 22 a whole not hiring female brokers? 23 MS. BARLOTTA: Object to form.	Page 110	Page 112

1 MS. BARLOTTA: As a fact witness. 2 Testify. 3 MS. GILL: Well, are you putting 4 somebody else up to answer that question? 5 MS. BARLOTTA: Yeah, we already told 6 you that. 7 MS. GILL: Okay. I just wanted to 8 make sure. I wanted it to be clear. 9 Q. (BY MS. GILL:) What is your opinion 10 on that issue? 11 A. They should apply to all employees. 12 (Whereupon, a discussion off the 13 record was held.) 14 Q. And just to be clear, this is your 15 30(b)(6) deposition. 16 MS. BARLOTTA: On the topics in which 17 he's designated. Anything else outside of that 18 and his opinion is his fact witness testimony. 19 MS. GILL: Well, we reserve the right 20 to take a separate fact witness deposition at 21 that time. 22 MS. BARLOTTA: Well, you'll have to 23 take it up with the Court. We've already gotten	Page 113	1 lot of other factors, you know, how long somebody 2 has worked with a particular retailer, we always 3 try to divide the book of business up between 4 account executives so that one person takes 5 ownership hopefully. 6 We want them to take ownership of 7 those agents from a customer service and customer 8 experience perspective. 9 Q. So the account executives take 10 ownership of doing those responsibilities for 11 those particular -- 12 A. For those particular -- 13 Q. -- clients? 14 A. Yes. 15 Q. Okay. 16 VIDEOGRAPHER: I'm sorry, Trish. Do 17 you have your microphone? 18 MS. GILL: Oh, I don't. I'm sorry. 19 A. And the same thing with inside 20 brokers. 21 Q. (BY MS. GILL:) Inside brokers are 22 assigned an account executive to be responsible? 23 A. No. They have certain agencies that
1 into many factual issues outside of the 30(b)(6) 2 notice. 3 MS. GILL: We will. 4 MS. BARLOTTA: Let's take a break. 5 VIDEOGRAPHER: All right. We'll go 6 off the record. The time is 11:50 a.m. 7 (Whereupon, a lunch recess was 8 taken.) 9 VIDEOGRAPHER: We are back on the 10 record at 1:03 p.m. 11 Q. (BY MS. GILL:) I'm just going to go 12 back and ask a couple of questions about the 13 structure again -- 14 A. Yeah, sure. 15 Q. -- that I missed as I was going 16 through it. Did you assign agents to Clay 17 Segrest or Kathryn Hendrix? 18 A. The way we do that is account 19 executives and inside brokers. Every book of 20 business and most teams are set up like this. 21 There's a group of agents that every broker does 22 business with that makes up their book of 23 business, and depending on relationships and a	Page 114	1 they handle among different -- like different 2 teams will have inside brokers handle certain 3 retail relationships as well. 4 Q. So an inside broker has account 5 executive duties that they're wholly responsible 6 for? 7 A. Not necessarily account executive 8 duties, but just as far as continued growth and 9 development with that particular agent on a new 10 business perspective, involvement with renewals. 11 Q. If an inside broker is assigned 12 agents -- I'm sorry -- clients that their duty is 13 to maintain, would they also be assigned an 14 account executive? 15 A. Yeah, in some cases. 16 Q. Was Kathryn assigned an account 17 executive? 18 A. Yeah, when we restructured the book, 19 I guess the last time, it would have been early 20 -- sometime the end of 2018, maybe early 2019, I 21 don't recall exactly the date, but there were a 22 few agencies. 23 There was AssuredPartners in

Page 117	Page 119
1 Columbus, Ohio. There was Willis Birmingham. 2 There was Insure in North Carolina. There was 3 McGriff in Raleigh-Durham, North Carolina where 4 she was the inside broker handling that business, 5 and Yvette was handling the quoting and some of 6 the administrative work for AssuredPartners. 7 Tiffany Sanders, I believe, was 8 assigned some of the administrative, quoting and 9 processing for Willis, and then Andrea took on 10 some of the administrative components of McGriff 11 North Carolina. So yeah. 12 Q. And you said that happened when you 13 restructured in early 2018? 14 A. I don't recall the exact timeframe on 15 that. Sometime in 2018, I believe. 16 Q. Would it have been -- 17 A. I think it was after when we had the 18 lunch. 19 Q. It was after she complained that she 20 had too much administrative duties? 21 A. Uh-huh (positive response). 22 Q. When she was promoted, were the 23 accounts that -- or clients that she was	1 But if you wanted to delegate it, you 2 could have, correct -- 3 A. Sure. 4 Q. -- to an account executive? 5 A. Sure. 6 Q. The account executives are assigned 7 those tasks and ultimately responsible for those 8 tasks, and they can't delegate it to somebody 9 else? 10 MS. BARLOTTA: Object to form. 11 A. Sure, correct. 12 Q. Okay. And you said it's not 13 immediate. It's not a switch. If Kat says it 14 was about two years later that the restructuring 15 occurred after her promotion, do you have any 16 reason to think it was that much time had passed? 17 MS. BARLOTTA: Object to form. 18 A. You know, I don't know if there's any 19 specific timeframe. I mean, you know, we say 20 this all the time in our industry, it's a 21 marathon, not a sprint. It takes years to 22 develop a career in the insurance industry, much 23 like a legal profession.
Page 118	Page 120
1 responsible for removed from her? 2 A. No. 3 MS. BARLOTTA: Object to form. 4 Q. So she had the inside broker duties 5 and those accounts that she had when she was 6 executive assistant? 7 MS. BARLOTTA: Object to form. 8 A. It's not like it's an immediate. 9 Like when you get moved from an account executive 10 to an inside broker, it's not like a switch is 11 flipped. 12 Like we said before, inside brokers, 13 brokers, all brokers still handle functions 14 within a team and do what's necessary on a 15 particular relationship, whether it be an entire 16 office relationship or whether it be a specific 17 account relationship. It's something that 18 happens over time. 19 Q. And I understand you have clients, 20 and so you're going to get something -- like, for 21 example, you said you did certain things when you 22 were on the road, because it's just what the 23 account needed.	1 It's relationship based. It takes 2 time to get the confidence in a client for them 3 to trust you with their business. It's very -- 4 it's a very intensive learning curve from a 5 coverage perspective, because we deal with so 6 many different products. 7 Q. So would you agree with her it was 8 about two years before the restructuring 9 occurred? 10 MS. BARLOTTA: Object to form. 11 A. I don't remember the exact dates. We 12 restructured things a couple of different times 13 to try to take some of that administrative 14 workload off of her. 15 Q. Okay. You mentioned someone named 16 Steele Cadden? 17 A. Uh-huh (positive response). 18 Q. Is he related to John Cadden? 19 A. He is. 20 Q. And what is their relationship? 21 A. Father, son. 22 Q. Okay. And did Mr. Cadden, the 23 father, have any role in approving Steele

1 Cadden's bonuses? 2 MS. BARLOTTA: Object to form. 3 A. They were sent to him; but, I mean, 4 no authority, no nothing. That was my decision. 5 Q. Okay. Did the Birmingham office of 6 CRC maintain discrimination complaints? 7 MS. BARLOTTA: Object to form. 8 A. I don't know. That seems more 9 appropriate for HR. 10 Q. Well, that's why I was asking did 11 Birmingham. Did Birmingham office CRC, not 12 Truist HR? 13 MS. BARLOTTA: Object to form. 14 A. I don't know the answer to that. 15 Q. Did you maintain any complaints of 16 discrimination? 17 A. No. 18 Q. What was the number of employees at 19 CRC between 2017 and 2020 in total? 20 A. Companywide? 21 Q. Yeah. 22 A. I do not know. 23 Q. How many employees were in human	Page 121 1 Q. Were you in control of hiring and 2 firing? 3 A. For my team, yes. 4 Q. When Kat came over to your 5 department, how was the offer to come to your 6 department conveyed to her? 7 A. It was a formal offer. We had put 8 out a position requisition for an account 9 executive. Her name was mentioned to me. I 10 can't remember who mentioned it to me, but at the 11 time Kat was working with -- Jack Elliott was her 12 boss at the time. He ran our administrative 13 compliance, I guess is the best way to refer to 14 it, group, which is where audit fell. Kat was in 15 the audit department. 16 We started looking for someone in 17 2014, was trying to find the right person. Her 18 name came up. I spoke to Jack in the office 19 about it, which typically happens when there's an 20 internal transfer. You want to make sure that, 21 you know, the other group feels like you're not 22 poaching their people. 23 Jack said he felt like Kat was good
1 resources? 2 A. I do not know. 3 Q. How many employees in CRC Birmingham? 4 A. I don't know. 5 Q. How many employees in the 6 professional liability department? 7 A. I'm going to say probably thirty, 8 plus or minus. I don't know the exact number. 9 Q. When there was a vacancy in the 10 Birmingham office of CRC, how would people know 11 that opportunity existed? 12 A. Typically, it was posted on an 13 internal intranet site. 14 Q. On the intranet? 15 A. Uh-huh (positive response). I know 16 they also posted them on LinkedIn as well. 17 Q. Okay. You mentioned it was 18 typically. Was there ever a situation that it 19 was word of mouth? 20 A. I don't know. 21 Q. Did you ever hire anybody by word of 22 mouth? 23 A. No.	Page 122 1 for the position and was ready to move out of 2 audit, that she, in Jack's words, had expressed 3 that she was getting tired of all the travel that 4 was required by audit. And we put the offer 5 letter together through HR, and they presented it 6 to her, and she accepted. 7 Q. Is there ever a situation where like 8 you would request somebody on your team? 9 MS. BARLOTTA: Object to form. 10 A. And what do you mean by request? 11 Q. Like if there was an employee you 12 felt -- like I know you went to Jack in this 13 case. 14 A. Uh-huh (positive response). 15 Q. But her name was already given to 16 you. 17 A. Uh-huh (positive response). 18 Q. Is there ever a situation where you 19 just see an employee, you like how they're 20 working, and you just request that person to be 21 on your team? 22 MS. BARLOTTA: Object to form. 23 A. We've not really done that, I mean,

1 unless we're actively looking and we have a 2 position requisition or we know that we have an 3 open spot that we could bring somebody on for 4 continued growth. 5 I mean, we did it with Amy Ritenour, 6 who's on our team now. She was in our accounting 7 department, and we just reached out to her to see 8 if she was interested in making a move. 9 Q. If someone were to request somebody 10 from your team, would you convey that request to 11 that person? 12 MS. BARLOTTA: Object to form. 13 A. If someone came to me? 14 Q. Uh-huh (positive response), yes. 15 A. Sure, absolutely. 16 Q. Okay. Did Susan Phillips come to you 17 and say she wanted Kat on her team? 18 A. No. 19 Q. Did any other senior brokers ask for 20 Kat to come on the team? 21 MS. BARLOTTA: Object to form. 22 A. Not that I'm aware of. 23 Q. Did anybody tell you that either	Page 125	1 they pull that spreadsheet document that I was 2 referring to. And it basically looks at revenue, 3 number of individuals already on your team, your 4 team's total compensation, your team's travel and 5 entertainment expenses. 6 And there is a percentage, and I 7 don't know what the percentage is, but there is a 8 kind of a red light, green light, yellow light 9 approach that they see. And if you're green, 10 then that position is approved. 11 Q. I think you said there was a position 12 requisition form? 13 A. Uh-huh (positive response). 14 Q. So you have to fill that out and give 15 it to leadership? 16 A. Uh-huh (positive response). 17 Q. Okay. Do you know where those forms 18 are kept or stored? 19 A. I do not. 20 Q. And so if Susan Phillips or Dave 21 Sloneker were looking for an associate broker, 22 those forms should be somewhere at CRC? 23 MS. BARLOTTA: Object to form.	Page 127
1 Susan Phillips or two senior brokers had asked 2 for Kat on their team? 3 A. Not that I recall. 4 Q. Like Rusty Hughes or Mr. Cadden? 5 MS. BARLOTTA: Object to form. 6 A. No. 7 Q. Is there any documentation or like 8 Dashboard information or Workday information that 9 would show when either Susan Phillips or Dave 10 Sloneker needed an associate broker? 11 A. Not that I'm aware of. 12 Q. When does a team qualify for an 13 additional associate broker? 14 A. We got a -- I don't know what the 15 term is. It's kind of like an algorithm or Excel 16 spreadsheet that when someone thinks they might 17 be interested in hiring a new team member, that 18 document, they basically say, Hey, we want to put 19 out this position requisition form, and we're 20 looking for an account executive or whatever the 21 position is at X, and we're thinking X amount of 22 base salary range. 23 And we send that to leadership. Then	Page 126	1 A. I don't know the answer to that. 2 Q. Okay. Did you follow that process 3 when you needed an associate broker? 4 MS. BARLOTTA: Object to form. 5 A. The position requisition? 6 Q. Yes. 7 A. I didn't hire an associate broker. 8 Q. Is Clay Segrest an associate broker? 9 A. Oh, you're talking about Clay. Yes, 10 when Clay was hired, I don't think at that time 11 we even -- that was 2009. I don't recall a 12 position requisition form. Clay came to us as a 13 referral. 14 Q. Did you reach out to anyone else to 15 hire as an associate broker when you hired Clay? 16 A. I did not. 17 Q. Did you post a vacancy at that time? 18 A. I did not. 19 Q. Is that standard to not post a 20 vacancy? 21 MS. BARLOTTA: Object to form. 22 A. I don't know. At that time it really 23 wasn't a vacancy. It was a new position.	Page 128

1 Q. Okay. Are you -- did you have access 2 to Clay Segrest's application for employment? 3 A. I do not recall. I wasn't the team 4 lead, the team broker lead at that time. 5 Q. You weren't? 6 A. I was not. 7 Q. Who was? 8 A. Betsy Barnett. 9 Q. Let me show you Plaintiff's Exhibit 10 Number 8. 11 (Whereupon, Plaintiff's Exhibit No. 8 12 was marked for identification and a copy of same 13 is attached hereto.) 14 MS. GILL: We'll need to redact this 15 before it goes into the transcript. I'm reading 16 it. Sorry. 17 Q. (BY MS. GILL:) What position did 18 Clay apply for? 19 A. This says here broker assistant. 20 Q. So this was before you broke off from 21 Betsy? 22 A. It is. 23 Q. But Clay was hired for associate	Page 129	1 A. Inside brokers really don't travel 2 that often. There's no expectation. They can, 3 they could, but there's no expectation. 4 Q. On his application he mentions he 5 heard about the company through a family friend. 6 Does he have a friend that worked there that got 7 him the job? 8 MS. BARLOTTA: Object to form. 9 A. He does not. 10 Q. If you'll look at the second page of 11 that document, do you see the offer of 12 employment? 13 A. I do see that. 14 Q. Do you see what position he was 15 offered? 16 A. Yeah, yeah. Associate broker. 17 Q. So he got the associate broker off 18 the bat when he came in? 19 MS. BARLOTTA: Object to form. 20 A. According to this, yes. 21 Q. Are the qualifications for an 22 associate broker different than a broker's 23 assistant?	Page 131
1 broker? 2 MS. BARLOTTA: Object to form. 3 Q. At that time? 4 A. Broker assistant it shows here. 5 Q. Right. But, I mean, I'm asking what 6 position he was put into when he was hired. 7 MS. BARLOTTA: Object to form. 8 A. Broker assistant. 9 Q. Okay. When did he receive a 10 promotion? 11 MS. BARLOTTA: Object to form. 12 A. I don't recall. 13 Q. Would his personnel file reflect when 14 he got his promotion? 15 MS. BARLOTTA: Object to form. 16 A. I don't know. 17 Q. What percent of the time do brokers 18 travel? 19 A. There's no definitive answer to it. 20 It just depends on their own. There's no 21 requirement. 22 Q. Is it different from an associate 23 broker or an inside broker?	Page 130	1 MS. BARLOTTA: Object to form. 2 A. There really are no specific 3 qualifications for an associate broker. Clay was 4 hired -- when we hired Clay, Clay came in what we 5 referred to back then as a BIT, broker in 6 training. Clay had zero insurance experience. 7 He was hired in 2009 and started out -- 8 Q. When you say -- 9 A. Go ahead. 10 Q. Go ahead. 11 A. No, you go ahead. 12 Q. When you say a BIT, broker in 13 training, like B-I-T? 14 A. B-I-T. 15 Q. Is that initials for something? 16 A. Just acronym for broker in training. 17 Q. And are there any qualifications for 18 inside broker? 19 A. No, not any formal qualifications in 20 terms of training. It's really -- you know, when 21 someone is hired, it's on-the-job experience. 22 It's time in the trenches. It's, like I said, a 23 marathon versus a sprint. Lots of hours spent	Page 132

1 reviewing coverage forms, given different 2 scenarios and circumstances around claims, policy 3 wording. 4 Q. And the same question for account 5 executive: Are there any qualifications for 6 that? 7 A. It's the same. 8 Q. So would it be fair to say that for 9 all the positions offered on your team, it's 10 training -- on-the-job training? 11 A. Yeah. 12 MS. BARLOTTA: Object to form. 13 A. For the most part. 14 Q. A minute ago you were talking about 15 different agencies that were assigned to Kat 16 Hendrix. How did you determine which agencies 17 were assigned to her? 18 A. I mean, a lot of it was -- you know, 19 when someone new is brought onto a team, 20 typically that person -- you know, we're not 21 going to take existing retailers that a 22 particular person might have been servicing for 23 years and years and years and have personal	Page 133	1 Q. What other inside brokers performed 2 administrative tasks? 3 A. I didn't have another inside broker 4 on my team. 5 Q. Do you know if they did on other 6 teams? 7 A. Yes. 8 Q. I mean they were assigned 9 administrative tasks on other teams? 10 A. Yes. 11 Q. Okay. What position is responsible 12 for quoting policies? 13 A. For sending out the quote? Account 14 executive. 15 Q. And what position is responsible to 16 bind policies? 17 A. To actual issue the binder of 18 insurance, account executives. But as I've said 19 before, that's something that every single 20 position in the firm in our department does in 21 some capacity. 22 Q. But you can delegate it to your 23 account executive?	Page 135
1 relationships and disrupt that unless there's a 2 need. 3 So, typically, when someone new is 4 hired, that person picks up new clients. You 5 know, as we go out and visit and see new clients 6 and new retailers start to submit business to us, 7 those are assigned to usually the newest person 8 on the team. 9 Q. How would you determine that with the 10 executive -- I'm losing a position in my mind -- 11 account executive? 12 A. Same way. 13 Q. Okay. So like the different 14 secretarial or administrative tasks that Kat was 15 complaining she was doing, she was doing those 16 because she was newer on the team? 17 MS. BARLOTTA: Object to form. 18 A. At that time, she was an account 19 executive, yeah. 20 Q. But she continued to do those when 21 she became inside broker? 22 MS. BARLOTTA: Object to form. 23 A. Some, yes.	Page 134	1 MS. BARLOTTA: Object to form. 2 A. Sure. 3 Q. Is there a difference in pay between 4 account executive and inside broker? 5 A. Not necessarily. 6 MS. BARLOTTA: Object to form. 7 Q. Are there any agency breakouts 8 showing assignments on other teams? 9 MS. BARLOTTA: Object to form. 10 A. Not that I'm aware of. 11 Q. Would Clay Segrest bind or quote 12 policies? 13 A. Yes. 14 Q. Is there a certain procedure or 15 policy that applies to requesting a transfer to a 16 different department? 17 MS. BARLOTTA: Object to form. 18 A. Not that I'm aware of. 19 Q. How are transfers determined? 20 A. I think the person that's wanting to 21 be transferred has to communicate that to someone 22 and request it. 23 Q. Do you ever involuntarily transfer	Page 136

1 somebody from a department? 2 MS. BARLOTTA: Object to form. 3 A. Repeat the question, please. 4 Q. Do you ever involuntarily transfer 5 someone from the department? 6 MS. BARLOTTA: Object to form. 7 A. I have not. 8 Q. For example, if someone is not 9 getting along with somebody, say they don't need 10 to be working with this person, we're going to 11 transfer you to a different department? 12 A. I have not. 13 Q. Do you have -- my understanding is 14 Kathryn Hendrix requested a transfer. Do you 15 know why she was not transferred? 16 MS. BARLOTTA: Object to form. 17 A. I was never made aware that she had 18 requested a transfer. 19 Q. Did you ever discuss transferring 20 Kathryn Hendrix with Mr. Helveston? 21 MS. BARLOTTA: Object to form. 22 A. I did not. 23 Q. I'm sorry. A lot of this is	Page 137	1 Q. How do you know the person viewing 2 the module and the person clicking that it's done 3 is the same person? 4 MS. BARLOTTA: Object to form. 5 A. I don't know the answer to that. 6 Q. Is there any in-person training on 7 discrimination? 8 MS. BARLOTTA: Object to the form. 9 A. Not that I'm aware of. 10 Q. Are there any disciplinary policies 11 related to administering discipline on people who 12 are complained about? 13 A. Not that I'm aware. 14 MS. BARLOTTA: Object to form. 15 A. Not that I'm aware of. 16 Q. Do you know whether Clay Segrest was 17 ever disciplined in any way relating to Kathryn 18 Hendrix's complaint that he was treating her like 19 a secretary? 20 MS. BARLOTTA: Object to form. 21 A. Not that I'm aware of. 22 Q. Are you aware of whether Jonathan 23 Morgan was disciplined for misrepresenting his	Page 139
1 repetitive, so I'm going through it so I don't 2 ask you twice. 3 A. No problem. 4 MS. PALMER: What you really want is 5 for her to just mark out a whole page. 6 MS. GILL: I'm working on it. 7 THE WITNESS: Put a big X across all 8 of it. 9 Q. (BY MS. GILL:) Did Birmingham office 10 of CRC maintain the postings of positions that 11 were vacant? 12 MS. BARLOTTA: Object to form. 13 A. I've never seen any. I don't -- I 14 couldn't speak to that definitively. I don't 15 know. 16 Q. Okay. We talked about the training 17 and how it was a computer -- computerized 18 training. Was it simply where you just do a 19 module and then click on it when you're done and 20 then move to the next one and click on it when 21 you're done? 22 MS. BARLOTTA: Object to form. 23 A. Uh-huh (positive response).	Page 138	1 heading in the e-mails? 2 MS. BARLOTTA: Object to form. 3 A. Not that I'm aware of. 4 Q. Are you aware of whether Clay Segrest 5 was disciplined for omitting Kat Hendrix from his 6 out-of-office notice? 7 MS. BARLOTTA: Object to form. 8 A. Not that I'm aware of. 9 Q. Did you receive any training on how 10 or -- whether computerized, written, or anything, 11 on how to respond to complaints of EEOC charges 12 of discrimination? 13 MS. BARLOTTA: Object to form. 14 A. Not that I recall. 15 Q. Were you required to assist in the 16 response to Kat Hendrix's EEOC charge? 17 MS. BARLOTTA: Object to form. 18 A. I was not. 19 Q. I only have two of these. I'll let 20 you look at it. I'm sorry. 21 (Whereupon, Plaintiff's Exhibit No. 9 22 was marked for identification and a copy of same 23 is attached hereto.)	Page 140

1 Q. Are you familiar with this document? 2 A. I am. 3 Q. What is this document? 4 A. It was my response, I guess, once I 5 was made aware of the EEOC charge. 6 Q. Okay. 7 A. I just sat down and put some things 8 together myself so that we would have them. 9 Q. What was -- do you have a date that 10 you prepared this? I don't see it. 11 A. I don't. I don't know. I mean, 12 based on that third page -- well, I don't know 13 the answer to that. I just see where Stefani 14 Petty, November 22nd, 2019, told me that Kat had 15 resigned effective today and filed an EEOC 16 charge. So that looks like that was the date 17 that I was made aware of the EEOC charge. 18 Q. Okay. I see. Is that Exhibit Number 19 9 all of the notes that you prepared? 20 A. I don't recall. 21 Q. If you look at the third page, it 22 looks like there's some typewritten -- there's a 23 typewritten word that says "redacted." Were	Page 141	Page 143
there additional notes? A. I don't know. I don't remember. Q. Okay. So -- MS. BARLOTTA: There are additional notes. We've withheld them as privileged. As a point of compromise, we produced these because y'all were very interested in them, but the rest of the notes have involved attorney/client conversations, so -- MS. GILL: That's fine. I just wanted it to be clear on the record. A. Yeah, my bad. Q. (BY MS. GILL:) Okay. Do you know the plaintiff's -- do you know Kathryn Hendrix's dates of employment? A. She joined our team July 2014 -- no. Yeah, July 2014, I believe. Q. Do you remember when she left? A. July 2019. Q. Do you know the reason she left? A. She filed FMLA. Q. Did -- when she came on your team, did you perform a background check on Kathryn	Page 142	Page 144
Hendrix? A. I did not personally. Q. Do you know if Kathryn Hendrix held any other positions at CRC? A. She did. We talked about it earlier. She was in our audit department, yeah. Q. Okay. So would it be fair to say she was in the audit department, and then she became an account executive and then inside broker? MS. BARLOTTA: Object to form. A. Yes. Q. Are you aware of any other positions? A. None that I'm aware of. Q. Are you aware of any discipline received by Kat? A. Not that I'm aware of. Q. How did you determine Kat's base salary? A. When we put the position requisition form out, we had a -- we would have had a salary range that would have been approved, and that was what we offered her when we approached her about taking the position, accepting the position.		

1 Q. And now that you say it, I remember 2 we did talk about that earlier. 3 A. No problem. 4 Q. Okay. What benefits was Kat Hendrix 5 entitled to? 6 A. That would be a question for HR. 7 Q. Okay. Did you -- is Kat Hendrix 8 eligible for rehire? 9 A. I don't know the answer to that 10 question. That would be a HR question. 11 Q. HR? Okay. If she is eligible, would 12 you consider her for an associate broker 13 position? 14 A. I don't know the answer to that. 15 Q. Okay. And just so I understand your 16 prior testimony correctly, the inside broker is 17 not required to travel, but they can? 18 A. Yeah. 19 Q. And so they're not required to drum 20 up new business or are they? 21 A. They're not. 22 Q. Okay. Do you know whether there's a 23 job description for an account executive?	Page 145	Page 147
1 MS. BARLOTTA: Object to form. 2 A. I've not seen it. There should be, 3 but I've not seen it. 4 Q. Is that a question for HR? 5 A. That would be a question for HR, job 6 description documents. 7 Q. Does Workday contain the job 8 description? 9 A. I don't know the answer to that. 10 Q. Let me show you Plaintiff's Exhibit 11 10. 12 (Whereupon, Plaintiff's Exhibit No. 13 10 was marked for identification and a copy of 14 same is attached hereto.) 15 A. Okay. 16 Q. There you go. 17 A. Thank you. 18 Q. Have you seen this document? 19 A. I have. 20 Q. Were you involved in preparing this 21 document? 22 A. In 2017? 23 Q. Yes.	Page 146	Page 148

1 A. Yeah. 2 Q. This is Plaintiff's Exhibit Number 3 12. 4 (Whereupon, Plaintiff's Exhibit No. 5 12 was marked for identification and a copy of 6 same is attached hereto.) 7 A. Thank you. 8 Q. I want to direct your attention to 9 the affirmative defenses section, which looks 10 like it's Page 9 of 18. 11 A. Okay. 12 Q. I'm going to direct you -- 13 MS. BARLOTTA: He's not designated on 14 this, but you can ask him questions as a fact 15 witness. 16 MS. GILL: Oh, he's not? Is there a 17 separate person that's going to be designated? 18 MS. BARLOTTA: Ms. Petty. 19 MS. GILL: Ms. Petty? Okay. 20 Q. (BY MS. GILL:) Never mind then on 21 those questions. 22 A. All right. 23 Q. Were you responsible for locating	Page 149	Page 151
1 documents responsive to our requests for 2 production? 3 MS. BARLOTTA: Object to form. 4 A. I was not. 5 Q. Do you know who was? 6 A. I do not. 7 MS. BARLOTTA: Object to form. 8 Q. Is this a question for Ms. Petty? 9 MS. BARLOTTA: Object to form. 10 Q. The HR? 11 A. I would think so. I wasn't involved 12 in document production. 13 Q. Let me ask you this: Did you take 14 any efforts to locate documents responsive to the 15 requests for production? 16 MS. BARLOTTA: Object to form. 17 A. I think I went back and searched a 18 couple of e-mails, but that was the extent of it. 19 Nothing else. And I, of course, produced the -- 20 I wrote up the document that we looked at 21 earlier, Exhibit 9 -- 22 Q. The notes? 23 A. -- I guess. Yes, Exhibit 9. That	Page 150	Page 152

1 MS. BARLOTTA: Object to form. 2 A. Yes. I don't know at which point, 3 but I remember seeing that document. 4 Q. And was there an investigation after 5 she requested severance? 6 MS. BARLOTTA: Object to form. 7 A. Not that I'm aware of. I think 8 that's a more appropriate question for HR. 9 Q. Human resources? 10 A. Uh-huh (positive response). 11 Q. Are all salaries the same across the 12 board for associate brokers? 13 A. They are not. 14 MS. BARLOTTA: Object to form. 15 Q. I believe you mentioned there might 16 be a range. Do you know what that range is for 17 incoming associate brokers? 18 A. I do not. It depends on the team. 19 Q. Is there a range for inside brokers? 20 A. There is not. 21 Q. Is there a range for account 22 executives? 23 A. There is not.	Page 153	1 Q. Okay. What is a supplemental 2 commission? 3 A. I don't know. 4 Q. Do you know what an incentive 5 commission is? 6 A. I do not -- well, I mean, incentive 7 commission, I mean, we as an organization and as 8 a firm have incentives with our insurance 9 companies and retail agencies that we do business 10 with, certain commission agreements with them. 11 But that's with retail clients and insurance 12 companies. 13 Q. Okay. So they receive the bonus, the 14 supplemental incentive or you do -- 15 MS. BARLOTTA: Object to the form. 16 Q. -- from them? 17 MS. BARLOTTA: Object to form. 18 A. CRC would get it from insurance 19 companies. 20 Q. I gotcha. 21 A. And then we would pass on any similar 22 type of incentive comp or commission to our 23 retail clients. But that is not done at the	Page 155
1 Q. Are the bonuses, the semi-annual and 2 annual bonus, are they considered part of the 3 salary? 4 A. They are not. 5 Q. I've heard something, either in a 6 document or somewhere, about a contingent bonus. 7 What is that? 8 A. I don't know what you're referring to 9 there. 10 Q. Okay. Is there ever a situation 11 where a bonus could be granted to someone not -- 12 separate and distinct from the semi-annual and 13 the annual bonus? 14 A. Not that I'm aware of. 15 Q. Are there any other bonuses provided 16 to employees other than the semi-annual and the 17 annual? 18 A. None that I'm aware of. 19 MS. BARLOTTA: Object to form. 20 Q. I guess that's semi-annual. I don't 21 know why I'm saying semi-annual and annual. 22 Twice a year? 23 A. Right. I'm with you.	Page 154	1 individual broker team level. 2 Q. So members of the team don't receive 3 portions -- 4 A. No, absolutely not. 5 Q. Are there goals or KPIs that are 6 required to be achieved to receive a bonus? 7 A. No. 8 Q. And I think you said once the bonuses 9 are set, they're sent to Rusty Hughes, Cadden, or 10 Helveston, but they don't have any discretion or 11 authority to change it? 12 A. They've never exhibited any authority 13 or veto towards me personally. 14 Q. Is there training on the products 15 they're selling, the brokers? 16 A. There's no formal training. It's, 17 you know, just day-to-day reading policy forms. 18 When I started, you take a policy form home and 19 read it and highlight it and mark it up and over 20 and over and over again. 21 Q. So it's kind of like what we talked 22 about before, on-the-job training? 23 A. On-the-job training. A lot of	Page 156

<p>1 self-motivated on-the-job training.</p> <p>2 Q. Who decided to change Kat from</p> <p>3 account executive to inside broker?</p> <p>4 A. I made the decision.</p> <p>5 Q. Did you communicate this change in</p> <p>6 title to other employees of CRC and, if so, how</p> <p>7 did you do it?</p> <p>8 A. Yeah, I would have had to have</p> <p>9 discussed it with Rusty and probably John, but</p> <p>10 for sure Rusty.</p> <p>11 Q. What about the other members of your</p> <p>12 team? Did you discuss it with them?</p> <p>13 A. Yeah, after the fact. I mean, it was</p> <p>14 not -- it was my decision, but --</p> <p>15 Q. Right.</p> <p>16 A. -- we relayed that position -- that</p> <p>17 decision was announced to the entire department.</p> <p>18 Q. Was it a verbal announcement or was</p> <p>19 it an e-mail that went out?</p> <p>20 A. No. I sent out an e-mail.</p> <p>21 Q. Was -- when you notified -- when did</p> <p>22 you notify Kat Hendrix of her change in title?</p> <p>23 A. I don't remember the exact date.</p>	<p>Page 157</p> <p>1 A. That was a posted position, both</p> <p>2 internally; and if I remember correctly, it was</p> <p>3 also posted on LinkedIn. And Brandon was --</p> <p>4 Brandon came across that position through</p> <p>5 LinkedIn, if I remember correctly.</p> <p>6 Q. And I guess he just submitted a</p> <p>7 resume, and then it just went from there?</p> <p>8 A. He knew Dave outside of the office,</p> <p>9 and from what he's -- from what I remember him</p> <p>10 telling us, he inquired from Dave that he had</p> <p>11 seen a position that was open at CRC for an</p> <p>12 associate broker and asked him if he could give</p> <p>13 him some guidance on how to inquire about that</p> <p>14 position and who might be looking to hire.</p> <p>15 And Dave told him that it was</p> <p>16 actually him, and Brandon applied for the</p> <p>17 position.</p> <p>18 MS. PALMER: Side note: I went to</p> <p>19 law school with Brandon.</p> <p>20 THE WITNESS: Small world.</p> <p>21 MS. GILL: We've been going about an</p> <p>22 hour. Do y'all want to take a little bathroom</p> <p>23 break?</p> <p>Page 158</p> <p>1 Q. Was that through an e-mail or was</p> <p>2 that a verbal conversation?</p> <p>3 A. It would have been a verbal</p> <p>4 conversation if I remember correctly.</p> <p>5 Q. Was she provided any kind of list or</p> <p>6 description of what her new and additional duties</p> <p>7 would be?</p> <p>8 A. Not that I remember at that time, no.</p> <p>9 Q. How would she know what her job</p> <p>10 duties were?</p> <p>11 A. I mean, we had talked about it</p> <p>12 multiple times. I mean, she had been with us at</p> <p>13 that point from 2014 to 2017. I mean, she could</p> <p>14 have asked any question that she had. But --</p> <p>15 Q. So I guess it's, again, on-the-job</p> <p>16 training, like as issues arise?</p> <p>17 A. Yep.</p> <p>18 Q. Who made the decision to hire Brandon</p> <p>19 Hayes as an associate broker?</p> <p>20 A. That would have been Dave Sloneker.</p> <p>21 Q. Do you know how Dave Sloneker -- did</p> <p>22 he post the vacancy or did he find him by word of</p> <p>23 mouth?</p>	<p>Page 159</p> <p>1 A. MS. BARLOTTA: Sure.</p> <p>2 VIDEOGRAPHER: We'll go off the</p> <p>3 record at 2:06 p.m.</p> <p>4 (Whereupon, a brief recess was</p> <p>5 taken.)</p> <p>6 VIDEOGRAPHER: We are back on the</p> <p>7 record at 2:21 p.m.</p> <p>8 Q. (BY MS. GILL:) Do you know who made</p> <p>9 the decision to hire Jonathan Morgan?</p> <p>10 A. He's on Truitt Taylor's team, so</p> <p>11 Truitt Taylor would be my answer there, but</p> <p>12 different team, so I wouldn't have any way of</p> <p>13 really knowing with certainty.</p> <p>14 Q. Do you know who authorized Jonathan</p> <p>15 Morgan to put associate broker on the website?</p> <p>16 MS. BARLOTTA: Object to form.</p> <p>17 A. I do not.</p> <p>18 Q. Do you know whether Jonathan Morgan</p> <p>19 was ever instructed to correct the incorrect</p> <p>20 information?</p> <p>21 MS. BARLOTTA: Object to the form.</p> <p>22 A. I do not.</p> <p>23 Q. Do you know whether he was ever</p>
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1 disciplined for putting incorrect information on 2 the website? 3 MS. BARLOTTA: Object to form. 4 A. I do not. 5 Q. Has anyone -- well, would this be HR? 6 Has anyone complained to you of unfair treatment 7 by Clay, Corey, Rusty, John, or Ron? 8 A. No. 9 Q. Did Sarah Dunston ever work in your 10 department? 11 A. She did. 12 Q. When did she work in your department? 13 A. I don't remember the dates. 14 Q. Did Kristyn Smith ever work in your 15 department? 16 A. Yes. 17 Q. When did she work in your department? 18 A. I don't know the specific dates. 19 Q. Do you know whether there were any 20 sexual harassment complaints at CRC? 21 A. None that -- 22 MS. BARLOTTA: Object to form. 23 A. None that I'm aware of.	Page 161	Page 163
1 Q. Did Lauren Lindberg ever work in your 2 department? 3 A. Yes. 4 Q. What were the dates of her working in 5 your department? 6 A. I don't remember. 7 Q. Did CRC take any action after 8 receiving the letter from the attorney asking to 9 preserve evidence? 10 MS. BARLOTTA: Object to form. 11 A. I don't know the extent of any action, but I know that me personally, I was asked to sign the preservation of documents affidavit, I guess is how you would refer to it, or maybe it was not even an affidavit. Maybe it was I had to reply to an e-mail just attesting that I would not destroy any documents. 18 Q. What action, if any, did CRC take 19 after receiving Ms. Hendrix's resignation letter? 20 MS. BARLOTTA: Object to form. 21 A. I don't know the answer to that. 22 Q. Would that be a question for HR? 23 MS. BARLOTTA: Object to form.	Page 162	Page 164

Page 165	Page 167
<p>1 oftentimes when we get cyber liability accounts 2 in, I will pass them off to him or, you know, 3 engage with him.</p> <p>4 Q. Did you ever refer or pass off 5 accounts to Kat Hendrix?</p> <p>6 A. Yeah.</p> <p>7 Q. Can you name those accounts?</p> <p>8 A. I can't name them by name, but we had 9 an agency in Columbus, Ohio that she handled that 10 was an ambulance business, and she would take 11 those accounts and run with them, market them, 12 place them.</p> <p>13 Q. Did you ever take revenue-generating 14 accounts from Kat?</p> <p>15 MS. BARLOTTA: Object to form.</p> <p>16 A. No. We reassigned business within 17 the team, but it wasn't a revenue impacting.</p> <p>18 Q. Were lower level brokers handed 19 business from brokers on a regular basis?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 A. What do you mean lower level brokers? 22 What are you referring to?</p> <p>23 Q. Associate and inside versus broker.</p>	<p>1 about it internally was, I mean, every team 2 within our department, I don't want to say pods 3 or clusters, but we try -- I tried to keep our 4 team together, because so much of what we do on a 5 day-to-day basis is communicating throughout the 6 day, pre-pandemic, of course.</p> <p>7 But everybody is in the office, 8 you're communicating, and even though you might 9 not be intimately involved in the exact 10 conversation, you hear the conversation, the 11 dialogue, the market speak. So we try to keep 12 our teams together.</p> <p>13 And at the time that Kathryn was with 14 us, I mean, we were busting out of the seams, and 15 we were in the process of remodeling our office 16 space, which we have since done. It's freed up a 17 lot more offices. But at the time, it was -- 18 there was one office on the completely opposite 19 side of the department that we talked about.</p> <p>20 And Rusty and I had told Kathryn that 21 once the build-out was done, that she would get 22 an office on the side of the building that we 23 were in.</p>
Page 166	Page 168

1 MS. PALMER: Broker assistant. 2 Q. Broker assistant. 3 A. No, she's in a cube. 4 Q. I can't keep all these positions 5 straight. 6 A. She's in a cube. 7 Q. How was it determined Tiffany 8 received a better desk or better cubicle than Kat 9 Hendrix? 10 MS. BARLOTTA: Object to form. 11 A. I don't understand the question. I 12 don't understand why -- 13 Q. Well, from what I understand -- and 14 I'll show you Plaintiff's Exhibit 13. 15 (Whereupon, Plaintiff's Exhibit No. 16 13 was marked for identification and a copy of 17 same is attached hereto.) 18 Q. Under Kat's desk or a portion of 19 Kat's desk there was a bunch of wiring. Do you 20 see that? 21 A. I do. 22 Q. Does that accurately depict Kat's 23 desk?	Page 169	1 A. They do not. 2 Q. Do other offices have HR on-site? 3 A. I don't know the answer to that. 4 Q. So I need to ask HR? 5 A. Yes. 6 Q. Okay. Do you know what happened to 7 any of Ms. Hendrix's personal items and documents 8 contained in her desk after she was employed? 9 A. I do not. 10 Q. Did Kat Hendrix ever tell you she 11 wanted to be an associate broker? 12 A. I remember Kat and I having 13 conversations about that and about the travel 14 piece of it. And I always remembered her showing 15 interest in an inside broker role. 16 Q. What efforts were taken to preserve 17 and recover evidence on your cellphone as it 18 relates to this case and any communications you 19 may have had with Ms. Hendrix? 20 MS. BARLOTTA: Object to form. 21 A. I don't know the answer to that. 22 Q. Did you take any efforts to preserve 23 it?	Page 171
1 A. Yeah. 2 Q. And, I guess, why was Kat assigned to 3 this desk versus Tiffany, who was newer? 4 MS. BARLOTTA: Object to form. 5 A. It was the closest space to us at the 6 time. 7 Q. In other teams do inside brokers have 8 an office? 9 MS. BARLOTTA: Object to form. 10 A. Not all at the time. I mean, Brandon 11 Hayes, I just mentioned Brandon Hayes was either 12 an inside broker or associate broker, and he sat 13 in a cube next to Kat. 14 Q. Does he have an office now? 15 A. He does now. But we've since -- as a 16 department, we since have two new -- not two new, 17 but two other inside brokers, two female inside 18 brokers that don't have offices. They're in a 19 cube. 20 Q. Was Kat's new position of inside 21 broker ever listed on the website? 22 A. I don't know. 23 Q. Does CRC Birmingham have HR on-site?	Page 170	1 MS. BARLOTTA: Object to form. 2 A. No. I didn't delete anything. 3 Q. Okay. That's an effort. 4 A. Right. 5 Q. Did you take any steps to notify 6 other people in your department to preserve their 7 data on their cellphones? 8 MS. BARLOTTA: Object to form. 9 A. I did not. 10 MS. GILL: Can we talk a moment or 11 can we go off the record so that my co-counsel 12 and I can talk a moment? I think we're almost 13 done. I just want to make sure we're done. 14 VIDEOGRAPHER: We'll go off the 15 record at 2:42 p.m. 16 (Whereupon, a brief recess was 17 taken.) 18 VIDEOGRAPHER: We are back on the 19 record at 2:59. 20 Q. (BY MS. GILL:) Does Lauren still 21 work at CRC? 22 A. Lauren? 23 Q. Lindberg?	Page 172

1 A. She does not. 2 Q. And does Brandon Hayes still work 3 there? 4 A. He does not. 5 Q. So does he have an office there? I 6 think we were talking about an office. 7 A. No. He sat in a cube next to -- he 8 was a broker, but he sat in a cube next to 9 Kathryn. 10 Q. Let me show you what I'm marking as 11 Plaintiff's Exhibit 14 . 12 (Whereupon, Plaintiff's Exhibit No. 13 14 was marked for identification and a copy of 14 same is attached hereto.) 15 Q. Did you meet with John Cadden, 16 Stefani Petty, and Rusty? 17 A. Yeah, we had a call with them. I 18 mean, we had a call with Stefani, the three of 19 us. 20 Q. Okay. So you, Rusty, and John were 21 in one office, and y'all called Stefani Petty? 22 A. Yes. 23 Q. And it was about -- was it about	Page 173	Page 175
1 Kathryn Hendrix? 2 A. It would have been, yes. 3 Q. And what did y'all talk about? 4 MS. BARLOTTA: I'm going to object, 5 because I think that's covered by privilege. 6 Because this was after the EEOC charge was filed, 7 so that would have been at the direction of legal 8 counsel in response to -- in preparing a response 9 to her charge. 10 Q. Let me ask you this: Was legal 11 counsel invited to that meeting? 12 MS. BARLOTTA: If you know. 13 A. I don't know the answer to that. 14 Q. Was legal counsel a participant 15 during that meeting? 16 A. I don't recall. 17 Q. Do you remember you, Rusty, and John 18 in one room calling Stefani Petty? 19 A. Yes. 20 Q. You don't remember any lawyer being 21 involved in that conversation? 22 A. I do not. 23 MS. BARLOTTA: Object to form.	Page 174	Page 176

1 your burden to file a protective order on this 2 issue. 3 MS. BARLOTTA: Okay. Well, we can do 4 that. 5 MS. GILL: I guess we would just ask 6 that the -- 7 MS. BARLOTTA: He's not designated to 8 talk about the response to the charge anyway. So 9 he's just testifying as a fact witness, and all 10 these questions pertain to his fact deposition 11 testimony. 12 MS. GILL: Well, part of the 30(b)(6) 13 deposition notice talked about affirmative 14 defenses. 15 MS. BARLOTTA: And I already said he 16 wasn't designated on that, and he's not 17 designated on anything pertaining to the response 18 to the EEOC charge. 19 MS. GILL: We would just reserve the 20 right to reopen the deposition based on the 21 outcome of this, and also in the event some of 22 the documents I'm about to ask about are 23 produced, that we can go over those documents as	Page 177 1 Q. I'm showing you what I've marked as 2 Plaintiff's Exhibit -- did you get into why Ms. 3 Hendrix had a breakdown at a later point in time? 4 A. No. 5 Q. Okay. I'm going to show you what 6 I've marked as Plaintiff's Exhibit Number 15 . 7 (Whereupon, Plaintiff's Exhibit No. 8 15 was marked for identification and a copy of 9 same is attached hereto.) 10 Q. Did I give that to you? I did not. 11 Sorry. 12 A. Okay. 13 Q. Do you know what that document is? 14 A. Yep. 15 Q. Can you tell us what that document 16 is? 17 A. Yeah. It looks like an e-mail from 18 George Bennett, what day was that, August 1st, 19 2018. So George worked at TDC Specialty, which 20 is one of our insurance companies that we do 21 business with, a lot of business with. 22 And they had planned this event down 23 at Lake Martin at Willow Point, and they came up
Page 178 1 well. 2 Q. (BY MS. GILL:) Did you know why Ms. 3 Hendrix was on FMLA leave? 4 A. Not specifically. I remember that I 5 was in New York with my family, and I remember 6 this call vividly. I called Kat about something 7 work related, and she was -- we chatted for a 8 brief moment, and then she started crying, and I 9 asked her what was wrong, and she said that, I 10 don't know if you know this, but I have had 11 mental health problems in the past or have dealt 12 with mental health issues in the past, and I have 13 had a breakdown, and my doctor has recommended 14 that I take leave. 15 And my wife and kids were sitting 16 there next to me in LaGuardia Airport, and I 17 said, Kat, this place is secondary and do what 18 you need to do to take care of yourself. 19 Q. Did she say what caused her 20 breakdown? 21 A. And we will support you. She did 22 not. We did not get into any of the specifics or 23 details that I recall at that time.	Page 180 1 with the invitation list, and they sent this 2 e-mail out to, you know, the first group of 3 people or the people that they had that they 4 wanted to invite to this event. 5 Not a decision made by us. It was a 6 client of -- an insurance company that we do 7 business with sent this out. 8 Q. Okay. 9 A. And a lot of these people in this 10 e-mail are not even in the Birmingham office. 11 There's California office, there's Colorado 12 office, there's the Nashville office, the New 13 York office. 14 And then I sent Rusty an e-mail that 15 same day forty minutes later saying, Need to be 16 sure Kathryn and Lauren are invited to this. 17 Q. Okay. 18 A. Because I felt like they needed to be 19 there as well, even though Lauren was not on my 20 team. 21 Q. That's what I was going to ask you. 22 Was Lauren on your team? 23 A. No, she was not.

1 Q. Was Lauren a broker of any type? 2 A. She was an inside broker. 3 Q. Lauren was an inside broker? 4 A. Uh-huh (positive response). 5 Q. Okay. And Willow Point, is that a 6 golf course? 7 A. It is. 8 Q. Did everybody play golf? 9 A. I think the people that wanted to or 10 do play golf did. 11 Q. Do you know whether Ms. Hendrix was 12 given the opportunity to play golf? 13 A. I do not recall. I don't know. 14 Q. Do you recall whether she was 15 assigned to be on a pontoon boat instead of play 16 golf? 17 A. I don't know. I didn't plan the 18 event. 19 Q. Did Lauren become a broker after Kat 20 left? 21 A. I don't know the answer to that. I 22 don't remember. She wasn't on my team, so I 23 don't know the dates.	Page 181	1 Q. Okay. It looks like it's from Rusty 2 Hughes? 3 A. Yeah. 4 Q. And it's copying George Bennett. Do 5 you see that? 6 A. I do. 7 Q. And so Rusty Hughes is typing out the 8 agenda? 9 A. No. The way that I recall this is 10 George sent the agenda to Rusty, and Rusty copied 11 it and sent it to us. Rusty wouldn't have had 12 any involvement in setting the agenda here. It 13 was a TDC event. 14 Q. At the -- do you know if Rusty had 15 any input on CRC assignments? 16 A. No. 17 Q. On Page 718? 18 A. 718? 19 Q. At the bottom, 718. 20 A. No, he would not have. 21 MS. GILL: I think we are done. 22 THE WITNESS: Perfect. 23 MS. GILL: I do have a housekeeping	Page 183
1 Q. Is it possible that Lauren was not a 2 broker at the time of the golf incident? 3 A. I don't know. 4 Q. You said that you did not make the 5 assignments for the golf trip. Who did? 6 A. George Bennett or someone within TDC, 7 which is not a CRC company. 8 Q. Let me show you what I'm marking as 9 Plaintiff's Exhibit 16. 10 (Whereupon, Plaintiff's Exhibit No. 11 16 was marked for identification and a copy of 12 same is attached hereto.) 13 A. 16, yep. 14 Q. Did George ever work at CRC? 15 A. Yeah, he did. 16 Q. And at some point he moved to TDC? 17 A. Yes. 18 Q. Okay. I'm sorry. I need to give you 19 the exhibit. 20 A. Thank you. 21 Q. Have you seen that document? 22 A. I mean, I have at some point, yeah. 23 It was sent to me.	Page 182	1 measure to discuss. 2 MS. BARLOTTA: On the record or off 3 the record? 4 MS. GILL: We can do it on the 5 record. There's been a few documents -- oh, do 6 you have any questions for him? I'm sorry. I 7 forgot. 8 MS. BARLOTTA: No, I do not. 9 MS. GILL: I'm sorry. There's been 10 some documents that have been identified that we 11 believe are responsive to our requests for 12 production. One was Ms. Hendrix's Workday file, 13 her full file on Workday, her dashboard in the 14 intranet, documents related to -- on the intranet 15 and on LinkedIn for vacancies, the Excel 16 spreadsheet for new team members that goes to 17 leadership. 18 MS. BARLOTTA: Can you tell me what 19 requests these are responsive to? 20 MS. GILL: Do you have our requests 21 for production? 22 MS. PALMER: I mean, not right off. 23 MS. GILL: The Workday file and the	Page 184

1 dashboard all are responsive to the request for 2 Kathryn Hendrix's personnel file and for her 3 bonus calculations. 4 MS. BARLOTTA: I don't know about 5 that, but I don't have -- necessarily have a 6 problem producing it if we can get our hands on 7 it. I think the full Workday file was produced, 8 wasn't it, Kayla? 9 MS. WUNDERLICH: I would have to 10 double check. 11 MS. BARLOTTA: What part of the 12 Workday file do you think you don't have? 13 MS. GILL: I can tell you what was 14 produced for Clay was significantly much more 15 than what we got for Kathryn, for Kat. 16 The Workday file that was produced 17 for Clay had substantially more information than 18 the Workday file for Ms. Hendrix. 19 MS. BARLOTTA: Such as? 20 MS. GILL: Clay's file is CRC-Hendrix 21 4679 through 4731. 22 MS. BARLOTTA: He was there longer, 23 so, I mean, he might have more -- I mean, a	Page 185	1 it was maintained by the company. 2 MS. BARLOTTA: Maybe yes, maybe no. 3 MS. PALMER: There's -- this file 4 here is completely different. 5 MS. BARLOTTA: Then that would be 6 duplicative is my response. 7 MS. PALMER: I would argue that there 8 is additional information included in the audit 9 trail that's relevant to the nature of the 10 lawsuit. 11 MS. BARLOTTA: Such as? 12 MS. PALMER: Such as dates that 13 changes were made. 14 MS. BARLOTTA: And that's relevant to 15 what? 16 MS. PALMER: Whether she was or 17 wasn't actually promoted. 18 MS. BARLOTTA: Oh, you're saying 19 she -- it is your contention in this case that 20 she wasn't promoted to inside broker? 21 MS. PALMER: Our contention is that 22 the terms and conditions that she was subjected 23 to were not equal to males and that part of that	Page 187
1 bigger file. 2 MS. GILL: It's 2017 forward. 3 MS. BARLOTTA: Right, but he started 4 working for CRC in 2009, so you understand he's 5 been there a lot longer. 6 MS. PALMER: She started working 7 there in 2006, so she's been there longer. 8 MS. BARLOTTA: But in this 9 department, though. 10 MS. PALMER: So the information 11 specifically in the Workday file that I do not 12 believe that we have for Kat is all of the stuff 13 on the first few pages that shows a reporting 14 structure. It shows compensation changes. It 15 shows like an audit trail of any change made to 16 the file, and unless I'm just completely missing 17 it, we don't have that for her. 18 MS. BARLOTTA: Okay. I'll see, but 19 you have her compensation structure and the dates 20 of all of her pay changes. We have produced 21 that. 22 MS. PALMER: Yes, you have produced 23 the information, but not in the same format that	Page 186	1 includes the duties and job responsibilities that 2 she was assigned to do regardless of title. 3 MS. BARLOTTA: Specifically as to the 4 dates, you're saying that you think that there's 5 a document out there that's going to show that 6 she wasn't actually promoted to inside broker? 7 You're contending she wasn't promoted to inside 8 broker? 9 MS. PALMER: Yeah, I mean, I'm not 10 going to tell you like our position on the case 11 at this point. I can tell you that based on what 12 I've seen, what we have for her does not match 13 what we have for other people. And if it's a 14 uniform system, the information should be there, 15 and we're entitled to look at it. 16 MS. BARLOTTA: We will see if the 17 information is there. I don't think that you're 18 entitled to look at it. I think we have produced 19 what is -- we're supposed to have produced in 20 this case. You've got her compensation 21 structure. You've got all the dates that those 22 changes were made. 23 MS. PALMER: Okay.	Page 188

1 MS. BARLOTTA: I mean, we produced 2 her personnel file, so that's what we produced, 3 number one. What you're asking for is additional 4 information. 5 MS. PALMER: So I think that's part 6 of the hang-up is you're saying you produced her 7 personnel file, but then you guys produced this 8 Workday file for Segrest, which is part of a 9 personnel file. 10 MS. BARLOTTA: It's not part of a -- 11 okay, that's fine. It's different. 12 MS. PALMER: It contains personnel 13 information. It's an HRIS system. Our request 14 specifies a HRIS -- 15 MS. BARLOTTA: You are making a new 16 request. We'll see if we can accommodate it. It 17 is a new request, and we did respond to the 18 request. 19 MS. PALMER: The request for the 20 personnel file included an in-depth definition 21 that included all information, no matter how 22 maintained, in the HRIS system. 23 MS. BARLOTTA: I see personnel file	Page 189	Page 191
1 maintained by BB&T and Truist for plaintiff. 2 MS. PALMER: There's a definition 3 somewhere. 4 MS. BARLOTTA: All right. So you're 5 making a request for the Workday file, and -- to 6 the extent that it hasn't already been produced. 7 And you are making a request, a new request for 8 the dashboard, and that -- what you all produced 9 was a -- what I guess Ms. Hendrix did was like 10 took a screenshot of some sort of a computer 11 screen? 12 MS. PALMER: Of the dashboard, and we 13 specifically -- 14 MS. BARLOTTA: So we're not going to 15 have like a screenshot of a dashboard, right, at 16 this point in time, I wouldn't think. 17 MS. PALMER: He testified that he 18 could run a report based on date, and we 19 requested the dashboard specifically. I think we 20 requested the AIM information as well and was 21 told that that didn't exist. 22 MS. BARLOTTA: Where is that request? 23 MS. PALMER: Produce all charts,	Page 190	Page 192

1 listed on that dashboard. 2 MS. BARLOTTA: What might make sense 3 then is for you all to rephrase this request, 4 because the way it's written now is any and all 5 per marketing representative for over a year 6 worth of data. It's not limited in any sort of 7 scope. 8 So if you just want that for 9 plaintiff, I mean, can we -- 10 MS. PALMER: No, we don't want it 11 just for her. We want it for the Birmingham 12 Professional Liability. 13 MS. BARLOTTA: No, that's not going 14 to happen. 15 MS. GILL: We have more. 16 MS. BARLOTTA: I mean, you want -- I 17 mean, think about what this is asking, all 18 reports in the AIM system. He just told you that 19 was all of their client data. You want every 20 single report on every single client in the AIM 21 system? 22 MS. PALMER: No, we're looking for 23 the charts, dashboards, and reports that are like	Page 193	Page 195
1 those that we showed him the information -- 2 MS. BARLOTTA: That's different. 3 What I'm asking you then is to limit your request 4 to that specifically, for the people that you 5 want it for, because this is not what this 6 request is asking. 7 MS. PALMER: I guess we have a 8 different understanding of how the system works, 9 because my understanding is -- 10 MS. BARLOTTA: Well, I'm just reading 11 it. It says, Produce all charts, dashboards, or 12 reports evidencing the revenues per marketing 13 representatives on accounts in the AIM system. I 14 mean, I don't even know what that means. 15 MS. PALMER: The accounts are listed 16 in the AIM system. The AIM system feeds into 17 Connect. That's where the dashboard is. 18 MS. BARLOTTA: If you want the 19 Connect report, what I'm saying is ask for that. 20 MS. GILL: Okay. We would like the 21 Connect report for all the people in the 22 Birmingham Professional Liability department. 23 MS. BARLOTTA: Send me a request for	Page 194	Page 196

1 MS. BARLOTTA: Well, then you can 2 make that argument to the judge. 3 MS. GILL: Some of the documents that 4 you have produced show that they did review it, 5 so -- 6 MS. BARLOTTA: No. 7 MS. GILL: We'll take it up with the 8 judge. 9 MS. BARLOTTA: I know the e-mail 10 you're talking about. That's not what it shows. 11 MS. GILL: The vacancies on the 12 intranet, that were posted on the intranet that 13 he said -- 14 MS. BARLOTTA: We've produced that 15 already. You have it. 16 MS. PALMER: We have a chart that 17 shows -- it's like a -- I don't know, like an 18 Excel spreadsheet or something. 19 MS. BARLOTTA: Yeah, that's the 20 record of the job posting that we have. 21 MS. PALMER: He said LinkedIn. 22 MS. BARLOTTA: Right, and it shows it 23 was posted externally. I don't have a LinkedIn.	Page 197	Page 199
1 I don't have a LinkedIn post going back to 2017. 2 MS. PALMER: So there's no 3 information about the job other than the title. 4 MS. BARLOTTA: It's -- all is in that 5 spreadsheet that was produced to you, when it was 6 posted, when it was closed, who applied, what 7 their qualifications were, that it was posted 8 internally, that it was posted externally. It's 9 all there. 10 MS. PALMER: For those two positions? 11 MS. BARLOTTA: Yes. 12 MS. GILL: The Excel spreadsheet for 13 new team members, that goes to leadership? 14 MS. PALMER: No, that was something 15 he testified about the red light, green light, 16 like number formulas. 17 MS. GILL: Right. 18 MS. PALMER: We haven't seen anything 19 like that. 20 MS. BARLOTTA: Anything else? 21 MS. GILL: I was just telling you 22 that's something that he testified about that we 23 are requesting.	Page 198	Page 200

1 You can argue that to the Court. Job search 2 information is different from a requisition of I 3 need a job. That's what he testified to, that 4 there's a form that says, I want to hire 5 somebody, this is what I want to pay them. 6 Postings and job search information 7 is like, hey -- especially how this is phrased in 8 here, including applications, resumes of people 9 who applied for the jobs. 10 I mean, if y'all want it, just send 11 me a request for it, but we're not going to sit 12 here and tell me that we haven't produced this 13 information that's already responsive to these 14 requests. These are new requests that you're 15 making. 16 MS. GILL: The next thing on the list 17 is e-mails from Kathryn Hendrix and e-mail 18 promoting Kathryn Hendrix. He testified he sent 19 out an e-mail. 20 MS. BARLOTTA: Okay. I think he 21 testified that he told her. 22 MS. GILL: I think we asked how he 23 communicated it to his team. He said he sent out	Page 201	1 MS. GILL: We're done. 2 MS. BARLOTTA: Okay. We need to talk 3 about deposition dates. 4 VIDEOGRAPHER: We're going off the 5 record at 3:33 p.m. 6 7 8 9 FURTHER DEPONENT SAITH NOT 10 11 12 13 14 15 16 17 18 19 20 21 22 23
1 an e-mail. 2 MS. BARLOTTA: I'll have to see the 3 transcript. I don't think that that -- 4 MS. GILL: That's it. 5 MS. PALMER: There were a couple of 6 times, Rachel, that he said that would be for IT. 7 Are you putting up an IT person or can we expect 8 Stefani Petty for that? 9 MS. BARLOTTA: I think Stefani Petty 10 is going to be able to answer these to the extent 11 that we've agreed that they're going to be 12 testified to. As you know, we have a remaining 13 disagreement of the 30(b)(6). 14 MS. PALMER: Do you stand by our 15 position that it's y'all's burden to file a 16 protective order? 17 MS. BARLOTTA: And we will do that, 18 and I'm happy to do that. As I said, we agreed 19 that we would go forward with the deposition, and 20 anything that was not -- there was still a 21 dispute over or that was not adequately 22 addressed, that we could take that up with the 23 Court at that time.	Page 202	1 C E R T I F I C A T E 2 3 STATE OF ALABAMA) 4 JEFFERSON COUNTY) 5 6 I HEREBY CERTIFY that the above 7 and foregoing transcript was taken down by me in 8 stenotype, and the questions and answers thereto 9 were transcribed by means of computer-aided 10 transcription, and that the foregoing represents 11 a true and correct transcript of the testimony 12 given by said witness. 13 I FURTHER CERTIFY that I am 14 neither of counsel, nor of any relation to the 15 parties to the action, nor am I anywise 16 interested in the result of said cause. 17  18 19 /s/Tanya D. Cornelius 20 TANYA D. CORNELIUS, RPR 21 ACCR #378 Expires 10/1/2023 22 Notary Expires 9/13/26 23

Video Deposition of Corey Daugherty

6/21/2023

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